

EXHIBIT 12

March 08, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

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AUBRY MCMAHON,

Plaintiff, Case No.: 2:21-cv-00920

-against-

WORLD VISION, INC.,

Defendant.

-----X

VIDEO CONFERENCE
DEPOSITION

March 8, 2023
1:00 p.m.

EXAMINATION BEFORE TRIAL of

CHRISTINE TALBOT, a nonparty witness on behalf
of the Defendant herein, taken by the attorney(s)
for the Plaintiff, pursuant to Notice, held at
the above-mentioned time and place, before
THERESA RATIGAN, a shorthand reporter and Notary
Public within and for the State of New York.

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<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p>4 NISAR LAW GROUP, PC</p> <p>5 Attorneys for Plaintiff</p> <p>6 60 East 42nd Street, Suite 4600</p> <p>7 New York, New York 10165</p> <p>8</p> <p>9 BY: CASEY WOLNOWSKI, ESQ.</p> <p>10 cwolnowski@nisarlaw.com</p> <p>11</p> <p>12 GAMMON & GRANGE, PC</p> <p>13 Attorneys for Defendant</p> <p>14 1945 Old Gallows Road, Suite 650</p> <p>15 Tysons, Virginia 22182</p> <p>16</p> <p>17 BY: SCOTT J. WARD, ESQ.</p> <p>18 sjw@gg-law.com</p> <p>19 J. MATTHEW SZYMANSKI, ESQ.</p> <p>20 jms@gg-law.com</p> <p>21</p> <p>22 A L S O P R E S E N T:</p> <p>23 STEVE McFARLAND, Chief Legal Officer for</p> <p>24 World Vision Incorporated</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1 S T I P U L A T I O N S</p> <p>2 IT IS HEREBY STIPULATED AND AGREED</p> <p>3 by and between the parties hereto, through their</p> <p>4 respective counsel, that the certification, sealing,</p> <p>5 and filing of the within examination will be, and the</p> <p>6 same are hereby waived;</p> <p>7</p> <p>8 IT IS FURTHER STIPULATED AND AGREED that</p> <p>9 all objections, except as to the form of the</p> <p>10 question, will be reserved to the time of the trial;</p> <p>11</p> <p>12 IT IS FURTHER STIPULATED AND AGREED that</p> <p>13 the within examination may be signed before any</p> <p>14 Notary Public with the same force and effect as if</p> <p>15 signed and sworn to before this Court.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 4</p> <p>1 C. Talbot</p> <p>2 (Time noted: 1:02 p.m.)</p> <p>3 THE REPORTER: Good afternoon. My name</p> <p>4 is Theresa Ratigan. I'm with U.S. Legal</p> <p>5 Support, and I am the court reporter this</p> <p>6 afternoon.</p> <p>7 The attorneys participating in this</p> <p>8 deposition acknowledge that I am not</p> <p>9 physically present in the deposition room and</p> <p>10 that I will be reporting this deposition</p> <p>11 remotely.</p> <p>12 They further acknowledge that, in lieu of</p> <p>13 an oath administered in person, I will</p> <p>14 administer the oath remotely under penalty of</p> <p>15 perjury.</p> <p>16 The parties and their counsel consent to</p> <p>17 this arrangement and waive any objections to</p> <p>18 this manner of reporting.</p> <p>19 Please indicate your agreement by stating</p> <p>20 your name and your agreement on the record;</p> <p>21 counsels only, please.</p> <p>22 MR. WOLNOWSKI: Casey Wolnowski, I agree.</p> <p>23 MR. WARD: And Scott Ward, counsel for</p> <p>24 World Vision; I agree.</p> <p>25 (Identification of witness verified)</p>	<p style="text-align: right;">Page 5</p> <p>1 C. Talbot</p> <p>2 C H R I S T I N E T A L B O T, a nonparty witness</p> <p>3 herein, after having first been duly sworn by a</p> <p>4 Notary Public of the State of New York, upon being</p> <p>5 examined, testified as follows:</p> <p>6 BY THE REPORTER:</p> <p>7 Q Please state your name for the record.</p> <p>8 A Christine Ann Talbot.</p> <p>9 Q And your address, ma'am, for the record?</p> <p>10 A 7050 East Sunrise Drive, Unit 9106,</p> <p>11 Tucson, Arizona 85750.</p> <p>12 EXAMINATION BY MR. WOLNOWSKI:</p> <p>13 Q Good morning, Ms. Talbot. Let me go over</p> <p>14 some of the general ground rules. My name is Casey</p> <p>15 Wolnowski. I represent the plaintiff, Aubry McMahon,</p> <p>16 with respect to her lawsuit against World Vision</p> <p>17 Incorporated.</p> <p>18 You are not personally a defendant in</p> <p>19 this lawsuit; do you understand?</p> <p>20 A Yes.</p> <p>21 Q I'm going to ask you a series of</p> <p>22 questions concerning the circumstances surrounding</p> <p>23 Ms. McMahon seeking employment with World Vision. My</p> <p>24 goal today is not to confuse you. If you do not</p> <p>25 understand a question that I ask you, please tell me</p>

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<p style="text-align: right;">Page 6</p> <p>1 C. Talbot</p> <p>2 that you don't understand or ask me to rephrase the</p> <p>3 question and I will do my best to do that; in other</p> <p>4 words, unless you tell me, I'll assume that by you</p> <p>5 answering the question, you had no problem</p> <p>6 understanding the question.</p> <p>7 Is that okay?</p> <p>8 A Yes.</p> <p>9 MR. WOLNOWSKI: Let's go off the record</p> <p>10 for one moment.</p> <p>11 (Discussion held off the record)</p> <p>12 Q If you want to take a break, we can do</p> <p>13 that; however, all that I can ask is that if there is</p> <p>14 a pending question, please answer it before we take a</p> <p>15 break.</p> <p>16 Do you understand?</p> <p>17 A I do.</p> <p>18 Q Please verbalize your answers. Shaking</p> <p>19 of the head or answers such as "uh-huh" may not</p> <p>20 necessarily be clear for the court reporter who is</p> <p>21 typing down your answers. Also, please wait until I</p> <p>22 finish my question before you answer it. Not only</p> <p>23 will that make for the creation of a cleaner record,</p> <p>24 it will also make the court reporter's life easier</p> <p>25 today.</p>	<p style="text-align: right;">Page 7</p> <p>1 C. Talbot</p> <p>2 Is that okay?</p> <p>3 A Uh-huh, yes.</p> <p>4 Q Given that we are conducting this</p> <p>5 deposition via video, there are a few questions I</p> <p>6 would like to ask.</p> <p>7 Is there anyone else in the room where</p> <p>8 you are currently sitting?</p> <p>9 A There is not.</p> <p>10 Q If anybody enters the room where you are</p> <p>11 sitting during the deposition, I kindly ask that you</p> <p>12 identify that person for me.</p> <p>13 Do you have any papers or documents in</p> <p>14 front of you or anything viewable on your computer</p> <p>15 screen aside from this video platform?</p> <p>16 A There are no papers or documents on my</p> <p>17 desk here available to me.</p> <p>18 Q Is there anything on your computer screen</p> <p>19 aside from this video platform?</p> <p>20 A No.</p> <p>21 Q I also kindly ask you not to communicate</p> <p>22 with your attorney or any other individual when</p> <p>23 testifying on the record. This includes</p> <p>24 communication via text, e-mail, instant messaging,</p> <p>25 GChat, WhatsApp, or any other electronic chat</p>
<p style="text-align: right;">Page 8</p> <p>1 C. Talbot</p> <p>2 function; is that okay?</p> <p>3 A That's fine. Yes, that's okay.</p> <p>4 Q You were previously sworn in by the court</p> <p>5 reporter; thus, are you aware that you are under</p> <p>6 oath?</p> <p>7 A Yes.</p> <p>8 Q Do you understand that the oath you just</p> <p>9 took is the same oath you would take if this were a</p> <p>10 trial before a judge?</p> <p>11 A Yes.</p> <p>12 Q Do you understand that with the oath you</p> <p>13 just took, you agreed to tell the truth, the whole</p> <p>14 truth, and nothing but the truth?</p> <p>15 A Yes.</p> <p>16 Q The questions I'm about to ask you are</p> <p>17 routine that I ask every person I am deposing.</p> <p>18 Are you under the influence of drugs or</p> <p>19 alcohol today?</p> <p>20 A I am not.</p> <p>21 Q Are you under the influence of any</p> <p>22 medication which may impair your ability to</p> <p>23 understand my questions or to tell the truth?</p> <p>24 A I am not.</p> <p>25 Q Can you think of any reason why you</p>	<p style="text-align: right;">Page 9</p> <p>1 C. Talbot</p> <p>2 cannot provide truthful testimony today?</p> <p>3 A No.</p> <p>4 Q Has anybody told you not to give truthful</p> <p>5 testimony here today?</p> <p>6 A No.</p> <p>7 Q Did you review any documents in</p> <p>8 preparation for today's deposition?</p> <p>9 A Yes.</p> <p>10 Q Which documents did you review, ma'am?</p> <p>11 A The donor contact services job posting,</p> <p>12 and the World Vision U.S. business ethics and</p> <p>13 standards of conduct policy.</p> <p>14 Q Anything else?</p> <p>15 A No.</p> <p>16 Q Did you listen to any audio recordings in</p> <p>17 preparation for today's deposition?</p> <p>18 A No.</p> <p>19 Q Did you speak with anyone aside from your</p> <p>20 attorney in preparation for today's deposition?</p> <p>21 A No.</p> <p>22 Q I may use the acronym LGBTQ at points</p> <p>23 throughout this deposition. I will advise that for</p> <p>24 the purposes of this deposition today, LGBTQ stands</p> <p>25 for lesbian, gay, bisexual, transgender, queer or</p>

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<p style="text-align: right;">Page 10</p> <p>1 C. Talbot</p> <p>2 questioning.</p> <p>3 Do you understand?</p> <p>4 A I do.</p> <p>5 Q Ms. Talbot, have you ever been deposed</p> <p>6 before?</p> <p>7 A No.</p> <p>8 Q For whom are you currently employed?</p> <p>9 A I'm not currently employed.</p> <p>10 Q If you can recall, when was the last date</p> <p>11 that you were employed by World Vision in any</p> <p>12 capacity?</p> <p>13 A February 3rd.</p> <p>14 Q Of which year, ma'am?</p> <p>15 A Of 2023.</p> <p>16 Q Do you have a bachelor's degree?</p> <p>17 A I do.</p> <p>18 Q From where?</p> <p>19 A Wheaton College, Wheaton, Illinois.</p> <p>20 Q When did you receive it?</p> <p>21 A In 1985.</p> <p>22 Q Do you have any advanced degrees beyond a</p> <p>23 bachelor's degree?</p> <p>24 A No completed degree.</p> <p>25 Q Have you taken any educational courses in</p>	<p style="text-align: right;">Page 11</p> <p>1 C. Talbot</p> <p>2 furtherance of an advanced degree beyond a</p> <p>3 bachelor's?</p> <p>4 A Yes.</p> <p>5 Q Can you explain those to me?</p> <p>6 A Multiple courses at Illinois Benedictine</p> <p>7 University in human resources and organizational</p> <p>8 behavior.</p> <p>9 Q Is there any particular reason why you</p> <p>10 haven't completed it?</p> <p>11 A Got married, bought a house, travelled</p> <p>12 for a living.</p> <p>13 Q Ms. Talbot, when did you first start</p> <p>14 working for World Vision?</p> <p>15 A April 2015.</p> <p>16 Q What was your position when you first</p> <p>17 started working for World Vision?</p> <p>18 A Senior vice president, human resources.</p> <p>19 Q Have you held any other position aside</p> <p>20 from that position with World Vision?</p> <p>21 A No.</p> <p>22 Q So is it correct to say that the role</p> <p>23 that you have -- excuse me, the role that you had of</p> <p>24 senior vice president with HR in April of 2015 is the</p> <p>25 same position that you held in February of 2023 until</p>
<p style="text-align: right;">Page 12</p> <p>1 C. Talbot</p> <p>2 your employment ceased?</p> <p>3 A Yes.</p> <p>4 Q Have you held any other position with</p> <p>5 World Vision aside from that position?</p> <p>6 A No.</p> <p>7 Q Please explain to me what were the</p> <p>8 primary duties and responsibilities of a person</p> <p>9 holding the title of senior vice president of human</p> <p>10 resources with World Vision in January of 2021.</p> <p>11 A My primary responsibilities were to lead</p> <p>12 the human resource function.</p> <p>13 Q And if you could, please explain to what</p> <p>14 leading the human resource function entailed in</p> <p>15 January of 2021.</p> <p>16 A Overseeing the recruitment of talent for</p> <p>17 the organization. Overseeing training, employee</p> <p>18 engagement, employee benefits, compensation</p> <p>19 administration, administering the personal policies</p> <p>20 of the organization.</p> <p>21 Q From your knowledge, experience, and</p> <p>22 recollection, did those duties and responsibilities</p> <p>23 change materially at all between January of 2021 and</p> <p>24 February of 2023?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 13</p> <p>1 C. Talbot</p> <p>2 Q If you could, Ms. Talbot, please walk me</p> <p>3 through a typical week of work for you as a senior</p> <p>4 vice president for human resources with World Vision</p> <p>5 around January of 2021.</p> <p>6 A I would describe a typical week as</p> <p>7 multiple one-on-one meetings with my direct reports,</p> <p>8 meetings with other senior leaders; regular meetings</p> <p>9 with them. Lots of time on -- on Zoom. Lots of time</p> <p>10 on Zoom. Preparation of documents, PowerPoints,</p> <p>11 et cetera, in preparation for upcoming meetings.</p> <p>12 Q Anything else?</p> <p>13 A A typical week could have included a</p> <p>14 meeting with the CEO, the global head of HR,</p> <p>15 committees within the organization that meet on a</p> <p>16 periodic basis. Could include a meeting with my</p> <p>17 extended team.</p> <p>18 Q Thank you.</p> <p>19 In January of 2021, where was the office</p> <p>20 physically located for which you primarily worked?</p> <p>21 A Federal Way, Washington.</p> <p>22 Q From your recollection, in the month of</p> <p>23 January of 2021, how frequently did you work</p> <p>24 physically in the Federal Way World Vision office as</p> <p>25 opposed to working remotely?</p>

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<p style="text-align: right;">Page 14</p> <p>C. Talbot</p> <p>A I don't have a clear recollection of where we were in January of 2021 in the pandemic, so I -- I probably was working full time from home.</p> <p>Q In January of 2021, Ms. Talbot, where did you live?</p> <p>A Federal Way, Washington.</p> <p>Q At what point did you move from Federal Way, Washington after January of 2021?</p> <p>A I haven't formally moved from Federal Way, Washington. My primary residence is Federal Way, Washington.</p> <p>Q And if I might ask, why are you in Arizona right now, as of the date of this deposition?</p> <p>A I own a second home here and I snowbird in the winter.</p> <p>Q Understood.</p> <p>If you can, please explain to me the circumstances of your departure of employment with World Vision.</p> <p>A I retired.</p> <p>Q I'd like to ask you some questions about a person named Aubry McMahon who also occasionally goes by the name Aubry Atwood.</p> <p>Going forward, if I refer to Aubry</p>	<p style="text-align: right;">Page 15</p> <p>C. Talbot</p> <p>McMahon, I'm also referring to Aubry Atwood; do you understand?</p> <p>A Yes.</p> <p>Q At some point, did you come to learn that a person named Aubry McMahon or Aubry Atwood had applied for employment with World Vision Incorporated?</p> <p>A Yes.</p> <p>Q How did you first learn about this?</p> <p>A What -- could you clarify what "this" -- what are you referring to, "this"?</p> <p>Q Let me rephrase the question.</p> <p>How did you first learn that a person named Aubry McMahon or Aubry Atwood had applied for employment with World Vision Incorporated?</p> <p>A I would have learned about her application after an offer was extended.</p> <p>Q I think my question is more akin to how did you learn about it in terms of did somebody tell you, did you receive an e-mail, someone send you a letter in the mail, something else?</p> <p>A I -- yeah, I would have been informed by Melanie Freiberg.</p> <p>Q So you say you "would have been informed</p>
<p style="text-align: right;">Page 16</p> <p>C. Talbot</p> <p>by Melanie Freiberg."</p> <p>Is she the person who told you about Aubry McMahon having applied for employment with World Vision?</p> <p>A To the best of my recollection, yes, Melanie Freiberg.</p> <p>Q If you can recall, what was your role specifically with respect to Aubry McMahon in the application process for potential employment with World Vision?</p> <p>A So I oversee multiple functions in human resources, and one of those is recruitment. Melanie Freiberg was a direct report to me, and she oversaw the recruitment activities.</p> <p>Q Prior to January 4th, 2021 -- which is the date, I will represent to you, is the date an offer of employment was made to Aubry McMahon -- how many interactions did you personally have with Aubry McMahon whether it be via in person, telephone, e-mail, video conference, or any other form of communication?</p> <p>A I did not have any communications with Aubry McMahon.</p> <p>Q Ms. Talbot, I'd like to show you what has</p>	<p style="text-align: right;">Page 17</p> <p>C. Talbot</p> <p>been previously marked as Plaintiff's Exhibit Number 2. This is a document which is Bate-stamped WV 78 to 79. I will represent to you that this document was exchanged during the discovery phase of litigation in this matter.</p> <p>If you can, please review this document and let me know once you've completed doing so.</p> <p>If you'd like to read the document, I ask you kindly not to do it aloud.</p> <p>A I -- I would like to read the document.</p> <p>Q I would like you to do so, too, but if you were going to read out loud --</p> <p>A No, I won't read --</p> <p>Q -- then I would ask that we go off the record.</p> <p>A No, I won't read out loud. I'm just looking at how I open this. I have to download it.</p> <p>MR. WOLNOWSKI: Let's go off the record. (Discussion held off the record)</p> <p>MR. WOLNOWSKI: Okay. Let's go back on.</p> <p>Q Ms. Talbot, do you recognize this document?</p> <p>A I do not.</p> <p>Q Have you ever seen it before?</p>

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<p style="text-align: right;">Page 18</p> <p>C. Talbot</p> <p>A No.</p> <p>Q Based on your review of this document, is it correct that via letter dated January 5th, 2021, a written confirmation of an offer of employment was given to Aubry McMahon to work for World Vision in the position of donor/customer service representative trainee?</p> <p>MR. WARD: I'll object as to form. But you can answer.</p> <p>A Yeah, I believe that's what this letter represents.</p> <p>Q Based upon your review of this letter, is it correct that the job itself was to commence on February 1st, 2021?</p> <p>A I would need to go back and look at the letter again, I didn't re- -- recall the specific dates in the letter.</p> <p>Q That's okay. Yeah, I will just -- to make things easier, I will direct your attention to the first sentence at the top of the first page.</p> <p>A Yes, I see the words "commencing on February 1st, 2021."</p> <p>Q Prior to an offer of employment being made to Aubry McMahon, were you aware that an offer</p>	<p style="text-align: right;">Page 19</p> <p>C. Talbot</p> <p>of employment was going to be made to Aubry McMahon?</p> <p>A No.</p> <p>Q Ms. Talbot, I'd like to show you a document which was previously marked Plaintiff's Exhibit Number 3. One moment, ma'am.</p> <p>This is a document that is marked WV 80. It has -- it was exchanged during discovery phase of litigation in this matter.</p> <p>Please review this document and let me know once you've completed doing so.</p> <p>A (Perusing a document)</p> <p>I've -- I've read it.</p> <p>Q Do you recognize this document?</p> <p>A I don't recall seeing this document.</p> <p>Q Have you ever seen it before?</p> <p>A I don't recall that I have.</p> <p>Q For the record, I will represent that Exhibit 3 is an e-mail from Aubry McMahon to Catherine Miolla dated January 5th, 2021, sent at 11:56 a.m.</p> <p>If you can recall, how did you first come to learn of this e-mail, if you can recall?</p> <p>MR. WARD: I'll object as to form. You may answer.</p>
<p style="text-align: right;">Page 20</p> <p>C. Talbot</p> <p>A I don't recall specifically when or -- I don't recall specifically how I would have been informed about it. I do recall that I was informed that there was an e-mail from Aubry with the follow-up question of this nature. I recall being informed, I don't recall the details of how I was informed.</p> <p>Q Do you recall if the e-mail was forwarded on to you or provided to you in a different way, perhaps, printed off and handed to you, something along those lines?</p> <p>A I don't recall it being printed off and handed it to me, no. And I don't recall how I was informed.</p> <p>Q Okay. You had testified you don't recall how you were informed about this January 5th e-mail, but do you recall the person who informed you, whether it be Melanie Freiberg, Catherine Miolla, or somebody else?</p> <p>A I can tell you normally it would be Melanie who would inform me of anything specific to the recruiting function that she felt I should be aware of, so it would -- it would have been Melanie that would have told me.</p>	<p style="text-align: right;">Page 21</p> <p>C. Talbot</p> <p>Q Do you recall why Melanie told you?</p> <p>MR. WARD: I'm going to object as to form. You may answer.</p> <p>A Yes.</p> <p>Q Could you please explain to me?</p> <p>A The nature of the e-mail raised a question as to whether or not Aubry was able to be in compliance with our required standards of conduct.</p> <p>Q And if you could explain to me -- when you say "the nature of the e-mail," could you please -- specifically, what was about -- it about the nature of the e-mail that caused you and others to have that questioning?</p> <p>MR. WARD: Object as to form. You may answer.</p> <p>A Well, in the e-mail, Aubry self-identifies herself being married to another woman. And our standards of conduct require -- you know, to be eligible for employment, require that a job applicant or a job offeree affirm their ability to live according to our standards of conduct which specifically names marriage to be a biblical covenant between a man and a woman.</p>

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<p style="text-align: right;">Page 22</p> <p>C. Talbot</p> <p>Q Aside from what you just explained, was there anything else about the nature of the contents of this e-mail that caused you or others, to the extent you know, to have questions?</p> <p>A I can't think of anything.</p> <p>Q So first things first, who is Catherine Miolla who is the recipient of this January 5th e-mail?</p> <p>A Catherine is a recruiter for World Vision U.S.</p> <p>Q Is talent acquisition partner another term that is synonymous with recruiter?</p> <p>A Yes.</p> <p>Q From your recollection, was that the circumstance in January of 2021 as well?</p> <p>A The circumstance being?</p> <p>Q The circumstan- -- let me -- I'll rephrase the question.</p> <p>Were the title talent acquisition partner and recruiter interchangeable or synonymous with one other as of January of 2021?</p> <p>A Yes.</p> <p>Q In January of 2021, were you Ms. Miolla's supervisor?</p>	<p style="text-align: right;">Page 23</p> <p>C. Talbot</p> <p>A No.</p> <p>Q In January of 2021, were you her boss?</p> <p>A No.</p> <p>Q To the extent you know, could you have terminated her employment?</p> <p>A Yes.</p> <p>Q To the extent you know, could you have directed her daily work activities in January of 2021?</p> <p>A Highly unlikely.</p> <p>Q At some point, did you form a belief that Aubry McMahon may be a woman?</p> <p>A I'm confused by this phrase, "formed a belief."</p> <p>Can -- can you --</p> <p>Q Well --</p> <p>A -- maybe clarify that?</p> <p>Q Sure.</p> <p>At some point, did you ever learn that Aubry was a woman?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>You may answer.</p> <p>A Yes.</p>
<p style="text-align: right;">Page 24</p> <p>C. Talbot</p> <p>Q Do you recall when?</p> <p>A No.</p> <p>Q Do you recall how you learned?</p> <p>A I don't recall the specific conversation. I would learn such facts by talking with Melanie.</p> <p>Q From your recollection, did you surmise that Aubry may be a woman based upon her first name; Aubry being more traditionally a female's name than a male?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>You may answer.</p> <p>A Yeah, I don't recall specifically that the -- that the name Aubry was a prominent indicator.</p> <p>Q Did you form a belief that Aubry was a woman based upon the contents of this January 5th e-mail in which she states and advises that she's going to be having a baby?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>You may answer.</p> <p>A That would have been part of it.</p> <p>Q Can you recall anything else that was part of it?</p>	<p style="text-align: right;">Page 25</p> <p>C. Talbot</p> <p>MR. WARD: Form objection.</p> <p>You may answer.</p> <p>A Melanie would have presented me with what she understood from Catherine and from Aubry's application and self-identification. I would have learned from Melanie.</p> <p>Q At some point, did you form a belief that Aubry McMahon may be gay?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>You may answer.</p> <p>A I believed it to be a possibility, yes.</p> <p>Q And when did you conclude that it may be a possibility?</p> <p>A In the --</p> <p>MR. WARD: I'll object -- sorry.</p> <p>I'll object as to form.</p> <p>You may answer.</p> <p>A In -- in being informed that she was -- by her own e-mail telling us that she had a wife, I assumed also to be a she.</p> <p>Q At some point, did you form a belief that Aubry McMahon may be in a same-sex marriage?</p> <p>MR. WARD: I'll object as to form.</p>

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<p>1 C. Talbot</p> <p>2 You may answer.</p> <p>3 A I believed that to be a possibility.</p> <p>4 Q And when did you believe that that may</p> <p>5 have been a possibility?</p> <p>6 A When informed by Melanie of the contents</p> <p>7 of this e-mail.</p> <p>8 Q Okay. So I have some slightly different</p> <p>9 questions, Ms. Talbot, so please follow along.</p> <p>10 Did you ever learn that it was in fact</p> <p>11 true that Aubry McMahon was gay?</p> <p>12 MR. WARD: Objection as to form.</p> <p>13 You may answer.</p> <p>14 A You know, I don't know that I learned</p> <p>15 specifically that Aubry was gay, but that Aubry, by</p> <p>16 her own self-admission, was in a same-sex marriage.</p> <p>17 Q So if I'm understanding your response,</p> <p>18 you're stating that you've never conclusively learned</p> <p>19 whether or not she was indeed gay; is that a fair</p> <p>20 characterization?</p> <p>21 MR. WARD: Objection as to --</p> <p>22 A To the best of my --</p> <p>23 MR. WARD: -- form.</p> <p>24 You may answer.</p> <p>25 A To best of my recollection, I don't</p>	<p>1 C. Talbot</p> <p>2 recall definitively learning she was gay, to the best</p> <p>3 of my recollection.</p> <p>4 Q And that includes ever; is that correct?</p> <p>5 MR. WARD: Same objection.</p> <p>6 A Yeah.</p> <p>7 MR. WARD: You can answer.</p> <p>8 A Yeah.</p> <p>9 Q Did you ever learn that it was in fact</p> <p>10 true that Aubry McMahon was in a same-sex marriage?</p> <p>11 A To the best of my recollection, yes, I</p> <p>12 did learn that it was validated that she was in a</p> <p>13 same-sex marriage.</p> <p>14 Q If you can recall, when did you learn?</p> <p>15 A I don't recall specifically when I</p> <p>16 learned other than in that general time frame.</p> <p>17 Q Did you learn definitely at some point</p> <p>18 between January 5th and January 8 of 2021?</p> <p>19 MR. WARD: Objection as to form.</p> <p>20 You may answer.</p> <p>21 A Again, I wouldn't remember the specific</p> <p>22 dates. It would have been in that general time</p> <p>23 frame.</p> <p>24 Q Do you recall if you learned definitely</p> <p>25 after it was communicated to Ms. McMahon that the</p>
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<p>1 C. Talbot</p> <p>2 offer of employment was rescinded, which occurred on</p> <p>3 or about January 8th, 2021?</p> <p>4 A Could you repeat that? Could you say</p> <p>5 that again?</p> <p>6 MR. WOLNOWSKI: Ms. Ratigan, if you</p> <p>7 could, could you please read that back?</p> <p>8 (WHEREUPON, the previous question was</p> <p>9 read by the court reporter.)</p> <p>10 MR. WARD: Objection as to form.</p> <p>11 You may answer.</p> <p>12 A I'm having a hard time answering that</p> <p>13 question. It -- it -- it feels like there's a couple</p> <p>14 parts to that. I -- I just -- could -- could you</p> <p>15 break it down --</p> <p>16 Q Absolutely.</p> <p>17 A Thank you.</p> <p>18 Q I mean -- okay.</p> <p>19 A Yeah.</p> <p>20 Q So I can represent to you that the offer</p> <p>21 of employment made to Ms. McMahon was rescinded</p> <p>22 definitely on January 8th, 2021. Right. So I'm --</p> <p>23 I'm telling you that. So for purposes of my</p> <p>24 question, let's establish that as true.</p> <p>25 A Okay.</p>	<p>1 C. Talbot</p> <p>2 Q Did you learn that it was in fact true</p> <p>3 that Aubry McMahon was in a same-sex marriage before</p> <p>4 the offer of employment was rescinded, or after, if</p> <p>5 you know at all?</p> <p>6 A I -- I knew that Aubry was in a same-sex</p> <p>7 marriage and unable to comply with our required</p> <p>8 standards of conduct prior to the job offer being</p> <p>9 rescinded.</p> <p>10 Q And how did you learn that it was in fact</p> <p>11 true that Aubry McMahon was in a same-sex marriage;</p> <p>12 did somebody tell you, did somebody e-mail you,</p> <p>13 perhaps somebody text messaged you; if you can</p> <p>14 recall, how did you learn?</p> <p>15 MR. WARD: Objection as to form.</p> <p>16 You may answer.</p> <p>17 A Yeah, I -- I don't recall whether it was</p> <p>18 e-mail -- likely, it was in conversation with</p> <p>19 Melanie.</p> <p>20 Q Ms. Talbot, you had a number of</p> <p>21 communications with various folks at World Vision</p> <p>22 from January 5th, 2021 to January 8th, 2021 on the</p> <p>23 topic or topics involving Aubry McMahon; is that</p> <p>24 correct?</p> <p>25 A I don't recall those specifically.</p>

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<p style="text-align: right;">Page 30</p> <p>C. Talbot</p> <p>Q I'd like to show you what will be marked Plaintiff's Exhibit 14. I will represent to you that this was a document that was supplied during the discovery phase of litigation. It does not bear a Bates-stamped number. It is Defendant World Vision's privileged log.</p> <p>If you could, please review this document and let me know once you've completed doing so.</p> <p>MR. WARD: Can we pause just because the download is not working for me, so if you'd give me a minute -- and we can go off the record, I just need to --</p> <p>MR. WOLNOWSKI: Let's go off the record. (Discussion held off the record)</p> <p>(WHEREUPON, the above-referred-to document, Defendant World Vision's Privilege Log, Updated August 5, 2022, two pages, was marked as Plaintiff's Exhibit 14, for identification, as of this date.)</p> <p>MR. WOLNOWSKI: Please go back on the record.</p> <p>MR. WARD: Okay. Thank you.</p> <p>Mr. Wolnowski, since we're looking at a privilege log, obviously it involved</p>	<p style="text-align: right;">Page 31</p> <p>C. Talbot</p> <p>privileged communications, I'm just going to register at the front end an objection on the basis of attorney/client privilege and work product doctrine.</p> <p>I'm going to instruct the witness not to answer as to the content of any conversations that included legal counsel or that involved advice to or from legal counsel.</p> <p>I wanted to put that on the record at the front end, and then let you proceed with your questions, and that lets me just have my focus for objections as we get into this.</p> <p>MR. WOLNOWSKI: Thank you very much, Counselor.</p> <p>Q Ms. Talbot, have you had a chance to review the document marked Plaintiff's Exhibit 14?</p> <p>A Yes.</p> <p>Q Have you ever seen this document before?</p> <p>A No.</p> <p>Q So I am not interested about the specific content of any communications with respect to the questions that I'm going to ask you, and I would like to make that clear for you.</p> <p>A Okay.</p>
<p style="text-align: right;">Page 32</p> <p>C. Talbot</p> <p>Q Is it correct that on January 5th, 2021, you sent an e-mail to Melanie Freiberg, Steve McFarland, and Jean Thompson?</p> <p>A Which date, please?</p> <p>Q January 5th of 2021. And for, perhaps, clarity purposes, I'm going to direct your attention to halfway down the first page.</p> <p>A Yes, I see that registered.</p> <p>Q Is it correct that on January 5th, 2021, you sent an e-mail to Melanie Freiberg, Steve McFarland, and Jean Thompson?</p> <p>A Based upon the record represented here, yes.</p> <p>Q What role did Melanie Freiberg hold with World Vision Incorporated in January of 2021?</p> <p>A Director, talent management.</p> <p>Q Was she a subordinate of yours in January of 2021?</p> <p>A Yes.</p> <p>Q Were you her supervisor in January of 2021?</p> <p>A Yes.</p> <p>Q Were you her boss in January of 2021?</p> <p>A Yes.</p>	<p style="text-align: right;">Page 33</p> <p>C. Talbot</p> <p>Q To the extent you know, what role did Steve McFarland hold with World Vision Incorporated in January of 2021?</p> <p>A Steve was general counsel.</p> <p>MR. WOLNOWSKI: Off the record. (Discussion held off the record)</p> <p>MR. WOLNOWSKI: Back on.</p> <p>Q What role did Jean Thompson hold with World Vision Incorporated in January of 2021?</p> <p>A Jean was the assigned employment attorney to work with HR.</p> <p>Q Ms. Talbot, after reviewing this document, would you agree that from January 5th, 2021 to January 8th, 2021, you were either the sender or receiver of 11 e-mail communications with Melanie Freiberg, Steve McFarland, and/or Jean Thompson?</p> <p>A It appears that 11 is about the right number.</p> <p>Q Ms. Talbot, at some point on or about January 6th, 2021, were you a participant in an e-mail chain with Melanie Freiberg and Catherine Miolla with respect to how to respond to Aubry McMahon's January 5th, 2021 disclosures?</p> <p>A Did you say January 6th or --</p>

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<p style="text-align: right;">Page 34</p> <p>C. Talbot</p> <p>Q Yes.</p> <p>A January 6th.</p> <p>Well, since I don't remember these communication exchanges specifically back in 2021, I'm looking at what's of record here, and on January 6th, I'm not seeing anything with my involvement with Catherine Miolla on that day based upon this record here.</p> <p>Q Okay. Well, if you could, Ms. Talbot, I kindly ask you to set aside Plaintiff's Exhibit 14, because I'd like to show you another document.</p> <p>A Okay.</p> <p>Q Ms. Talbot, I'd like to show you what will be marked as Plaintiff's Exhibit Number 15. It is a document which bears Bates-stamped Numbers WV 6095 to 6096. It is a document which I can represent to you was exchanged during the discovery phase of litigation in this matter.</p> <p>If you could, please review this document and let me know once you've concluded doing so.</p> <p>A I have pulled it up and I'll begin reading it.</p> <p>Q Sounds good. Thank you.</p> <p>MR. WOLNOWSKI: Let's go off the record.</p>	<p style="text-align: right;">Page 35</p> <p>C. Talbot</p> <p>(Discussion held off the record)</p> <p>(WHEREUPON, the above-referred-to document, Bates-stamped Numbers WV-006095 through WV-006096, was marked as Plaintiff's Exhibit 15, for identification, as of this date.)</p> <p>MR. WOLNOWSKI: Okay. Let's go back on.</p> <p>Q Ms. Talbot, do you recognize this document?</p> <p>A I don't recall it specifically, but it -- it -- it is indeed my writing, now that I see this.</p> <p>Q Do you have any reason to dispute that the e-mail sent and received by you on January 6th, 2021 is indeed accurate as displayed here in Plaintiff's Exhibit 15?</p> <p>A I don't have any reason to dispute authenticity.</p> <p>Q Plaintiff's 15 seems to be an e-mail chain involving you, Melanie Freiberg, and Catherine Miolla which took place on January 6th, 2021; is that correct?</p> <p>A Yes.</p> <p>Q Now, in these e-mails, you mention something about reviewing a script.</p>
<p style="text-align: right;">Page 36</p> <p>C. Talbot</p> <p>Do you see that?</p> <p>A I do.</p> <p>Q What were you referring in this e-mail as to a script?</p> <p>MR. WARD: So I'm going to object on the basis of attorney/client privilege and work product.</p> <p>To the extent you can answer that without involving any sort of legal advice or counselor discussion, you may answer; but otherwise, I instruct the witness not to answer.</p> <p>A I would generally represent that in our interview processes, we have consistent and specific practices around all phases of recruitment.</p> <p>Q To the extent you can recall, was a script in development for use to discuss with Aubry McMahon?</p> <p>MR. WARD: Same privilege objection.</p> <p>You may answer subject to that.</p> <p>A I don't have any recollection of any script being developed specifically for any particular candidate, including Aubry.</p> <p>Q Do you recall ever receiving a script</p>	<p style="text-align: right;">Page 37</p> <p>C. Talbot</p> <p>from either Melanie Freiberg, Catherine Miolla, or anybody else for that matter?</p> <p>A I don't recall that.</p> <p>Q In your e-mail on January 6th, 2021, you mention offering to practice with Melanie and Catherine.</p> <p>Do you see that?</p> <p>A Yes.</p> <p>Q Well, what were you referring in this e-mail?</p> <p>MR. WARD: I'll make the same objection that subject to the privilege objection, you may answer.</p> <p>A Yes. That it would be my practice in a variety of circumstances involving employees or managers or potentially job candidates or leaders that if one of my staff members was planning for an important conversation, that they would have the opportunity to, you know, prac- -- practice so that they could deliver with their intent and do so with kindness.</p> <p>Q In this e-mail that you sent to both Melanie and Catherine on January 6th, there seems to be some content about a candidate not being a good</p>

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<p style="text-align: right;">Page 38</p> <p>1 C. Talbot</p> <p>2 fit.</p> <p>3 Do you see that?</p> <p>4 A Are you referring to my words describing</p> <p>5 "One time I had a finalist, high-level HR external</p> <p>6 candidate"?</p> <p>7 Q Yes. If I can be a little more clear.</p> <p>8 In the e-mail that you sent on</p> <p>9 January 6th to Melanie and Catherine, you wrote, and</p> <p>10 I quote, in part, "It is always hard when a candidate</p> <p>11 doesn't turn out to be a fit as originally</p> <p>12 evaluated."</p> <p>13 Do you see that?</p> <p>14 A I do.</p> <p>15 Q Did you write that?</p> <p>16 A That would be my writing, yes.</p> <p>17 Q Did you have any discussions with Melanie</p> <p>18 Freiberg and Catherine Miolla regarding Aubry McMahon</p> <p>19 not being a good fit either before or after you sent</p> <p>20 this January 6th e-mail?</p> <p>21 MR. WARD: So I'll repeat my objection</p> <p>22 based on privilege.</p> <p>23 Subject to that objection, you may</p> <p>24 answer.</p> <p>25 A Well, based upon the log that you showed</p>	<p style="text-align: right;">Page 39</p> <p>1 C. Talbot</p> <p>2 me previously that records the dates of different</p> <p>3 conversations, I would have.</p> <p>4 Q If you could, please explain everything</p> <p>5 you can remember about those discussions with Melanie</p> <p>6 and Catherine.</p> <p>7 MR. WARD: And I'll again object as to</p> <p>8 privilege.</p> <p>9 To the extent that you can answer without</p> <p>10 discussing the legal advice, you may answer.</p> <p>11 A Well, I don't have lots of specific</p> <p>12 recollection, let me be clear about that, but</p> <p>13 generally, the discussions would have been about</p> <p>14 whether this candidate was able to comply with our</p> <p>15 required standards of conduct, and so therefore, be a</p> <p>16 fit to join the organization as an employee.</p> <p>17 Q Is it fair to say that on or about</p> <p>18 January 6th, 2021, if a candidate was in a same-sex</p> <p>19 marriage, then that would be a disqualifier for</p> <p>20 employment on the basis that -- by virtue of that</p> <p>21 same-sex marriage, they would not be able to comply</p> <p>22 with World Vision's standards of conduct?</p> <p>23 MR. WARD: I'm going to object as to</p> <p>24 form.</p> <p>25 You may answer.</p>
<p style="text-align: right;">Page 40</p> <p>1 C. Talbot</p> <p>2 A Well, if an employee can't comply with</p> <p>3 the standards and -- and affirm that they are able to</p> <p>4 comply with the standards of conduct, then they</p> <p>5 wouldn't be eligible for employment; and yes, that</p> <p>6 was true in January of 2021.</p> <p>7 Q Ms. Talbot, in response to this</p> <p>8 January 6th e-mail, Melanie Freiberg responded and</p> <p>9 said in part, "I would love to take you up on your</p> <p>10 offer to practices," and then mentions looking at</p> <p>11 your calendar.</p> <p>12 Do you see that? It's at the top of</p> <p>13 page WV 6095.</p> <p>14 A I do.</p> <p>15 Q Did you and Melanie Freiberg have any</p> <p>16 discussion after this e-mail during which you engaged</p> <p>17 in any practice?</p> <p>18 A I don't recall it specifically, that</p> <p>19 conversation. It -- it -- it -- it may have</p> <p>20 happened, I just don't recall it specifically.</p> <p>21 Q Did you engage in any practicing with</p> <p>22 Catherine Miolla between January 5th and January 8th,</p> <p>23 2021?</p> <p>24 A I can't remember.</p> <p>25 Q Ms. Talbot, I'd like to show you what</p>	<p style="text-align: right;">Page 41</p> <p>1 C. Talbot</p> <p>2 will be marked Plaintiff's Exhibit Number 16. It is</p> <p>3 a document bearing Bates-stamped Numbers WV 6097 and</p> <p>4 6098. I can represent to you that this is a document</p> <p>5 that was exchanged during the discovery phase of</p> <p>6 litigation in this matter.</p> <p>7 If you could, please review this document</p> <p>8 and let me know once you've completed doing so.</p> <p>9 MR. WOLNOWSKI: Off the record.</p> <p>10 (Discussion held off the record)</p> <p>11 (WHEREUPON, the above-referred-to</p> <p>12 document, Bates-stamped WV-006097 through</p> <p>13 WV-006098, was marked as Plaintiff's</p> <p>14 Exhibit 16, for identification, as of this</p> <p>15 date.)</p> <p>16 MR. WOLNOWSKI: Okay. Okay. Back on.</p> <p>17 Q Ms. Talbot, do you recognize this</p> <p>18 document?</p> <p>19 A I don't. I -- it's a meeting invite -- I</p> <p>20 recognize it as an internal organization invite. I</p> <p>21 don't have specific recollection of this specific</p> <p>22 invite.</p> <p>23 Q Do you recall receiving this RingCentral</p> <p>24 invite --</p> <p>25 A I don't --</p>

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<p style="text-align: right;">Page 42</p> <p>C. Talbot</p> <p>Q -- on or about --</p> <p>A Yeah, I don't recall specifically receiving it.</p> <p>Q Do you have any reason to doubt that you did, in fact, receive it, however?</p> <p>A Based upon this written document, I don't have any reason to think that I did not receive it.</p> <p>Q On January 6th, 2021, Melanie Freiberg sent an e-mail to both you and Catherine Miolla to join a RingCentral meeting at 12 o'clock noon that day; is that correct?</p> <p>A Based upon this meeting invite, yes.</p> <p>Q From your recollection, is the document I just showed you to which is marked Plaintiff's Exhibit 16 that particular invite?</p> <p>A It would appear so.</p> <p>Q Did you attend that meeting?</p> <p>A I don't know. I don't recall.</p> <p>Q The subject line of that e-mail is entitled "Dry run (Catherine/Melanie/Christine)." Do you see that?</p> <p>A I do.</p> <p>Q During this RingCentral call, was the topic of Aubry McMahon being a woman discussed?</p>	<p style="text-align: right;">Page 43</p> <p>C. Talbot</p> <p>MR. WARD: I'm going to object as to form.</p> <p>You may answer.</p> <p>A Well, it doesn't say that specifically here, but I think that that could be possible.</p> <p>Q During this RingCentral call, was the topic of Aubry McMahon's sexual orientation discussed?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>A I don't recall.</p> <p>Q During this RingCentral call, was the topic of Aubry McMahon being gay discussed?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>A I don't recall.</p> <p>Q During this RingCentral call, was the topic of Aubry McMahon being in a same-sex marriage discussed?</p> <p>MR. WARD: I'll object as to form.</p> <p>A I just don't recall the -- this specific meeting. I do not recall this specific meeting.</p> <p>Q Either during or following this RingCentral call, did you conclude that if Aubry</p>
<p style="text-align: right;">Page 44</p> <p>C. Talbot</p> <p>McMahon was indeed gay, that her offer of employment would be rescinded?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>A World Vision would not rescind a job offer because of someone being gay.</p> <p>Q So I think you had answered this with an answer that describes World Vision's policy, and I'm not sure that that answers the question. I'm going to read the question back to you.</p> <p>Either during or following this RingCentral call, did you conclude that if Aubry McMahon was indeed gay, that the offer of employment would be rescinded?</p> <p>MR. WARD: Same objection as to form.</p> <p>A A job offer would not be rescinded by World Vision for a person identifying as gay.</p> <p>Q So is the answer to my question that you concluded that it would not be rescinded on account of her being gay; is that accurate?</p> <p>MR. WARD: I'm going to object as to form; mischaracterizes testimony.</p> <p>A A job offer would be rescinded if a candidate was unable to comply with our hiring</p>	<p style="text-align: right;">Page 45</p> <p>C. Talbot</p> <p>requirements which include being able to affirm and commit to living in accordance with our standards of conduct.</p> <p>Q So, Ms. Talbot, I appreciate that you're informing me about World Vision's policies. Right.</p> <p>My question is about your personal conclusions. Now, if you want to tell me that your conclusion was in accord with World Vision's policies, please do so, and then inform me what policy it is that you're following, but just telling me what the policy was, I don't believe is answering my question.</p> <p>Do you understand my concern?</p> <p>A I do. Let me try again.</p> <p>Q Sure. Just let me -- I'm going to read it one more time, and let's see if --</p> <p>A Okay. Thank you.</p> <p>Q Okay. Yes. But I do appreciate that you're giving me information. I just want to make sure that we're getting responses.</p> <p>Either during or following this RingCentral call, did you conclude that if Aubry McMahon was indeed gay, that the offer of employment would be rescinded?</p>

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<p style="text-align: right;">Page 46</p> <p>1 C. Talbot</p> <p>2 MR. WARD: And I'm going to object as to</p> <p>3 form, and also asked and answered.</p> <p>4 A I'm thinking.</p> <p>5 First of all, I don't have specific</p> <p>6 recollection that the outcome off of this call</p> <p>7 resulted in a particular decision. Being gay would</p> <p>8 not be the basis of rescinding a job offer.</p> <p>9 Q Ms. Talbot, either during or following</p> <p>10 this RingCentral call, did you conclude that if Aubry</p> <p>11 McMahon was indeed in a same-sex marriage, that the</p> <p>12 offer of employment would be rescinded?</p> <p>13 MR. WARD: I'm going to object as to</p> <p>14 form.</p> <p>15 A I concluded at some point -- I cannot</p> <p>16 link it to this specific meeting in my recollection.</p> <p>17 I concluded that at some point, if Aubry was in a</p> <p>18 same-sex marriage and unable to comply with our</p> <p>19 standards of conduct, that the job offer would, based</p> <p>20 upon our policy, need to be rescinded.</p> <p>21 Q If you could, Ms. Talbot, please explain</p> <p>22 to me, if it's possible, how would somebody who's in</p> <p>23 a same-sex marriage also be willing to comply with</p> <p>24 the standards of conduct; is that possible?</p> <p>25 MR. WARD: I'm going to object; calls for</p>	<p style="text-align: right;">Page 47</p> <p>1 C. Talbot</p> <p>2 speculation and form in general.</p> <p>3 A Our standards of conduct at World Vision</p> <p>4 specifically say to the job candidate that a</p> <p>5 requirement for being employed is the willingness and</p> <p>6 ability to affirm and live in compliance with our</p> <p>7 standards of conduct, a component of which references</p> <p>8 the biblical covenant of a marriage between a man and</p> <p>9 a woman.</p> <p>10 If an applicant is unable or unwilling to</p> <p>11 affirm and comply with that standard, they're not</p> <p>12 eligible for employment.</p> <p>13 Q And just so we're clear, that that was</p> <p>14 the advisory as it existed in January of 2021?</p> <p>15 MR. WARD: I'm going to object as to</p> <p>16 form.</p> <p>17 A That's what was reflected in our</p> <p>18 standards of conduct and business and ethics policy</p> <p>19 at that time. I -- I'm unclear about the word</p> <p>20 "advisory."</p> <p>21 Q Well, let me ask you a different way.</p> <p>22 The protocol or rule which you just</p> <p>23 described, was that the protocol or rule in existence</p> <p>24 in January of 2021?</p> <p>25 MR. WARD: I'm going to object as to</p>
<p style="text-align: right;">Page 48</p> <p>1 C. Talbot</p> <p>2 form.</p> <p>3 You may answer.</p> <p>4 A Yes, that was the policy in 2021.</p> <p>5 Q And specifically in January of 2021?</p> <p>6 A Yes.</p> <p>7 Q At any time between January 5th and</p> <p>8 January 8th, 2021, did you ever make an independent</p> <p>9 decision that you were going to rescind the offer of</p> <p>10 employment made to Aubry McMahon?</p> <p>11 A What do you mean "an independent</p> <p>12 decision"?</p> <p>13 Q Well, a decision by yourself.</p> <p>14 A I would not have made an independent</p> <p>15 decision.</p> <p>16 Q Well, I'm not asking what you would have</p> <p>17 done. I'm asking whether or not you did it.</p> <p>18 A No, I didn't -- I didn't make that</p> <p>19 decision independently. No.</p> <p>20 Q Do you know how the decision to rescind</p> <p>21 Aubry McMahon's offer was communicated to Aubry</p> <p>22 McMahon herself?</p> <p>23 A I don't recall specifically.</p> <p>24 Q Ms. Talbot, I'd like to show you what has</p> <p>25 been previously marked as Plaintiff's Exhibit 9. Is</p>	<p style="text-align: right;">Page 49</p> <p>1 C. Talbot</p> <p>2 a document bearing Bates-stamped Numbers WV 81 to 82.</p> <p>3 I can represent that this document was supplied</p> <p>4 during the discovery phase of the litigation in this</p> <p>5 case.</p> <p>6 Please review the document and let me</p> <p>7 know once you've completed doing so.</p> <p>8 MR. WOLNOWSKI: Let's go off the record</p> <p>9 for one moment.</p> <p>10 (WHEREUPON, a brief recess was taken,</p> <p>11 after which the following transpired:)</p> <p>12 (Time noted: 2:18 p.m.)</p> <p>13 MR. WOLNOWSKI: Okay. Let's go back on.</p> <p>14 CONTINUED EXAMINATION BY MR. WOLNOWSKI:</p> <p>15 Q Ms. Talbot, we just took a five-minute</p> <p>16 break.</p> <p>17 Did you talk to anybody during that</p> <p>18 break?</p> <p>19 A I talked to the cleaning lady who just</p> <p>20 showed up.</p> <p>21 Q Okay. Did you talk about this case?</p> <p>22 A No, I did not.</p> <p>23 Q I didn't think -- I assumed the answer</p> <p>24 was no, but I figured I would ask.</p> <p>25 Did -- did you -- aside from speaking to</p>

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<p style="text-align: right;">Page 50</p> <p>C. Talbot</p> <p>the cleaning lady, is there anything else you did on this five-minute break?</p> <p>A Bio break.</p> <p>Q Okay. So, Ms. Talbot, I've showed you a document marked Plaintiff's Exhibit 9.</p> <p>Have you ever seen this document before?</p> <p>A I -- I may have actually seen -- I may have actually seen this at some point.</p> <p>Q Okay.</p> <p>A I don't recall what point, but I -- but I may have, it looks familiar.</p> <p>Q And do you recall when you first reviewed this document?</p> <p>A No. I -- I could only tell you it looks familiar.</p> <p>Q Do you recall who sent it to you?</p> <p>A I don't.</p> <p>Q This document appears to be an e-mail chain between Catherine Miolla and Aubry McMahon beginning January 5th and ending January 8, 2021; would you agree?</p> <p>A Yes.</p> <p>Q In this January 8th, 2021 e-mail, which appears at the top of the first page, the page</p>	<p style="text-align: right;">Page 51</p> <p>C. Talbot</p> <p>Bates-stamped WV 81, Ms. Miolla wrote to Ms. McMahon, "Aubry, since our communication on Tuesday, I've tried several times to get in touch with you to discuss a discrepancy in your interview responses. Since I have not heard back from you to resolve the discrepancy, I am rescinding the job offer that was extended to you on Monday, January 4th."</p> <p>Do you see that, Ms. Talbot?</p> <p>A Yeah, I do.</p> <p>Q Do you know what was the discrepancy referenced by Ms. Miolla in this January 8th, 2021 e-mail?</p> <p>A I believe I do.</p> <p>Q If you could, please explain to me what -- what it was.</p> <p>A Well, the discrepancy would have been Aubry's answers in the interview screening process surrounding our standards of conduct, a requirement for employment, and subsequent information indicating Aubry being in a same-sex marriage, which would mitigate being able to be in compliance with those -- those standards of conduct that we have regarding the biblical covenant of marriage between a man and a woman.</p>
<p style="text-align: right;">Page 52</p> <p>C. Talbot</p> <p>Q Ms. Talbot, I'd like to show you what has been previously marked Plaintiff's Exhibit 6. It is a document bearing Bates-stamped Numbers WV 67 to WV 70. I can represent that this document was exchanged during the discovery phase of litigation in this case.</p> <p>If you could, please review this document and let me know once you've completed doing so.</p> <p>MR. WOLNOWSKI: Off.</p> <p>(Discussion held off the record)</p> <p>MR. WOLNOWSKI: Back on.</p> <p>Q Ms. Talbot, do you recognize this document?</p> <p>A I haven't seen this document with these answers, no. Uh-uh, no.</p> <p>Q Is it fair to say today is the first time that you've ever seen this document?</p> <p>A Yes, it is fair to say that.</p> <p>Q To your knowledge, was it this document which contained the purported discrepancy as eluded to in the January 8th e-mail from Ms. Miolla to Ms. McMahon?</p> <p>A Well, there is a discrepancy between the answers that are recorded here from Aubry and the</p>	<p style="text-align: right;">Page 53</p> <p>C. Talbot</p> <p>representation in the subsequent e-mail of being in a same-sex marriage that would present a discrepancy.</p> <p>Q If you could, Ms. Talbot, please explain to me what the discrepancy is from this document which is marked Plaintiff's Exhibit 6.</p> <p>MR. WARD: Objection as to form.</p> <p>You may answer.</p> <p>A Well, in -- in this document which represents the interview process, if you look on the page that identifies -- under the "Key Points in Christian Conduct Conversation," and you look at the examples of behaviors that we -- referring to World Vision -- believe are not in alignment with our standards of conduct and therefore unacceptable behavior for employees or employment, since this was an employment screening conversation, it, in that second bullet, refers to sexual conduct outside of a marriage, defined as between a man and a woman.</p> <p>What I'm reading here is when Aubry was asked, "Do you have any questions about the standards of conduct or the expectations of compliance," the response provided by Aubry was, "No, not at all."</p> <p>Then the follow-up question, you know, it's important that you know the expectations so you</p>

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<p style="text-align: right;">Page 54</p> <p>1 C. Talbot</p> <p>2 can decide if, you know, there's a right</p> <p>3 organizational fit, and the specific, "Are you</p> <p>4 willing and able to comply with the standards of</p> <p>5 conduct," the answer I'm reading here is yes, "I'm</p> <p>6 aligned, yes."</p> <p>7 And those answers would be in discrepancy</p> <p>8 with an e-mail requesting information about benefits</p> <p>9 for a same-sex spouse.</p> <p>10 Q So, Ms. Talbot, just so we're clear,</p> <p>11 between January 5th and January 8th, 2021, was this</p> <p>12 phone screen document ever brought to your attention?</p> <p>13 A I don't recall. I know I haven't seen</p> <p>14 this -- as I said before, I haven't seen this</p> <p>15 document before. I don't recall seeing this before.</p> <p>16 Q Was the contents of this phone screening</p> <p>17 document discussed between you and/or Ms. Miolla or</p> <p>18 Ms. Freiberg between January 5th and January 8th,</p> <p>19 2021?</p> <p>20 MR. WARD: So I'm going to -- I'm going</p> <p>21 to --</p> <p>22 THE WITNESS: Yes.</p> <p>23 MR. WARD: And -- and just let me</p> <p>24 register my objection, because I'm going to</p> <p>25 object.</p>	<p style="text-align: right;">Page 55</p> <p>1 C. Talbot</p> <p>2 To the extent that calls for information</p> <p>3 that comes within the attorney/client or the</p> <p>4 work product privilege, I'll object to form.</p> <p>5 Subject to disclosing any attorney/client</p> <p>6 information or other privileged information,</p> <p>7 you may answer to the extent of your</p> <p>8 knowledge.</p> <p>9 A Could I have the question repeated for</p> <p>10 me, please?</p> <p>11 MR. WOLNOWSKI: Ms. Ratigan, could you</p> <p>12 please read it back?</p> <p>13 (WHEREUPON, the previous question was</p> <p>14 read by the court reporter.)</p> <p>15 Q Ms. Talbot, do you understand the</p> <p>16 question?</p> <p>17 A Yeah, I do.</p> <p>18 I -- I believe it would have been.</p> <p>19 Q If you could, please tell me everything</p> <p>20 you can remember about those conversations.</p> <p>21 MR. WARD: I'm going to repeat the</p> <p>22 privilege objection, and instruct the witness,</p> <p>23 you can answer to the extent that it doesn't</p> <p>24 involve -- involve legal counsel or legal</p> <p>25 counsel's advice.</p>
<p style="text-align: right;">Page 56</p> <p>1 C. Talbot</p> <p>2 A Well, if you go back to the document you</p> <p>3 previously shared with me about all of the privileged</p> <p>4 discussions that were recorded, what that reminded me</p> <p>5 of and what would be true in deciphering the</p> <p>6 situation with, you know, such a discrepancy and a</p> <p>7 job offer, those conversations would have included</p> <p>8 one or more attorneys, and I cannot give back to you</p> <p>9 specific recall of conversations on dates of which I</p> <p>10 can't remember.</p> <p>11 Q Well, do you know, was -- excuse me, is</p> <p>12 Ms. Miolla an attorney?</p> <p>13 A No.</p> <p>14 Q Is Ms. Freiberg an attorney?</p> <p>15 A No.</p> <p>16 Q But you did have conversations with them</p> <p>17 about the contents of the standards of conduct phone</p> <p>18 screen document between January 5th, 2021 and</p> <p>19 January 8th, 2021; correct?</p> <p>20 A That's likely. What I don't recall is</p> <p>21 which of any of those conversations were had without</p> <p>22 the presence of legal counsel. And what would be</p> <p>23 likely is that all of those conversations would have</p> <p>24 involved legal counsel, but we can go back to the log</p> <p>25 and look and see.</p>	<p style="text-align: right;">Page 57</p> <p>1 C. Talbot</p> <p>2 MR. WARD: Well, I'm -- just so I'm clear</p> <p>3 on the record, my objection is both as to</p> <p>4 conversations that involve counsel, but also</p> <p>5 conversations that discuss advice of counsel.</p> <p>6 My understanding is the privilege protects</p> <p>7 that for any organization that's discussing</p> <p>8 counsel internally, even if in that</p> <p>9 conversation, counsel is not in the room.</p> <p>10 So to the extent that the conversation</p> <p>11 discussed things that were not intertwined</p> <p>12 with advice of counsel, and you recall, that's</p> <p>13 something that can be answered; but to the</p> <p>14 extent that it's intertwined with advice of</p> <p>15 counsel, my instruction is not to answer.</p> <p>16 A I -- I would like to characterize that in</p> <p>17 questions of an employment nature, it would -- it --</p> <p>18 it -- it had been my practice and our practice to</p> <p>19 involve counsel for advice.</p> <p>20 Q So I am just asking about communications</p> <p>21 in which no counsel was present with either</p> <p>22 Ms. Miolla or Ms. Freiberg as it relates to the</p> <p>23 content of the phone screen doc and the standards of</p> <p>24 conduct.</p> <p>25 Do you have any recollection of those</p>

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<p style="text-align: right;">Page 58</p> <p>C. Talbot</p> <p>communications?</p> <p>A I -- I can't -- I do not specifically recall that there was any conversation that would have been with Catherine or Melanie without counsel present. I -- I -- I -- I can't remember if there was or if there wasn't.</p> <p>Q Okay. To your knowledge, what was the reason or reasons why the job offer extended to Aubry McMahon was rescinded?</p> <p>A Well, the reason that the offer would have been rescinded is the inability for Aubry to meet one of the fundamental requirements of employment with World Vision U.S., which would be affirming and complying with the standards of conduct which were described in the interview process.</p> <p>Q Now, when you answered that question, you said that "it would have been."</p> <p>Was that, in fact, the reason?</p> <p>A Yes. To the best of my recollection, yes.</p> <p>Q Was there any other reason?</p> <p>A I don't recall any other reason that that offer would have been rescinded.</p> <p>Q Was it because she disclosed that she was</p>	<p style="text-align: right;">Page 59</p> <p>C. Talbot</p> <p>gay?</p> <p>MR. WARD: I'm going to object as to form.</p> <p>A It would not have been because she disclosed she was gay.</p> <p>Q You had responded to that question saying "it would not have been."</p> <p>Was it --</p> <p>A It was not -- the job offer was not rescinded because she was gay.</p> <p>Q Was the job offer rescinded because she was not as expedient as desired in getting back to Catherine with respect to e-mails sent to her?</p> <p>A The job offer --</p> <p>MR. WARD: I'm going to --</p> <p>A -- was not rescinded --</p> <p>MR. WARD: Sorry. I'm going to object as to form.</p> <p>You may answer.</p> <p>A The job offer was not rescinded because of the timeliness or lack thereof in responding to Catherine's questions.</p> <p>Q Ms. Talbot, I'm going to read you something, and then I'd like to know whether or not</p>
<p style="text-align: right;">Page 60</p> <p>C. Talbot</p> <p>you agree with it.</p> <p>The following question and answer were interposed at the deposition of Melanie Freiberg. Specifically, it's at page 74, lines 4 through 10.</p> <p>"Question: If you know, who was the person or who were the persons who made the ultimate decision to rescind the offer of employment extended to Aubry McMahon by World Vision Incorporated?</p> <p>"Answer: The person who made the ultimate decision to rescind the offer was Christine Talbot, senior vice president of human resources."</p> <p>Do you agree with Ms. Freiberg's answer to that question?</p> <p>A I do.</p> <p>Q So just so we're clear, were you the person who made the ultimate decision to rescind the offer of employment extended to Aubry McMahon to work for World Vision Incorporated?</p> <p>A Yes. It was the duty of my job.</p> <p>Q Did you communicate this decision to either Catherine Miolla or Melanie Freiberg?</p> <p>A I don't recall, but I would have, yes.</p> <p>Yes.</p> <p>Q If you can recall, how did you</p>	<p style="text-align: right;">Page 61</p> <p>C. Talbot</p> <p>communicate it to them; was it done via telephone, e-mail, video conference, handwritten letter, something else?</p> <p>A I -- I -- I don't -- I don't recall the specifics of the communication.</p> <p>Q Irrespective of the method, do you recall when you communicated it to either of them?</p> <p>A I don't recall the specific date or time. It would have been in the time frame in which we're talking about this occurred.</p> <p>Q Okay. Have you ever been made aware that at some point Melanie Freiberg and Catherine Miolla spoke with Aubry McMahon on the telephone regarding World Vision's decision to rescind the job offer?</p> <p>A Repeat that question, please.</p> <p>Q Have you ever been made aware that at some point, Melanie Freiberg and Catherine Miolla spoke with Aubry McMahon on the telephone regarding World Vision's decision to rescind the job offer?</p> <p>A I think I might have a vague recollection that they did.</p> <p>Q And if you can recall, how did you learn about this call?</p> <p>A I don't remember that. I don't remember</p>

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<p style="text-align: right;">Page 62</p> <p style="text-align: center;">C. Talbot</p> <p>1 that.</p> <p>2</p> <p>3 Q Ms. Talbot, I'd like to provide you with</p> <p>4 what has been previously marked Plaintiff's</p> <p>5 Exhibit 10 which is an MP3 audio file. I will</p> <p>6 represent to you that this audio file was exchanged</p> <p>7 during discovery phase of litigation in this matter.</p> <p>8 MR. WOLNOWSKI: So we can go off the</p> <p>9 record.</p> <p>10 (Discussion held off the record)</p> <p>11 MR. WOLNOWSKI: Let's go back on the</p> <p>12 record.</p> <p>13 Q Ms. Talbot, were you able to listen to</p> <p>14 the audio file which I supplied you which has been</p> <p>15 previously marked Plaintiff's Exhibit Number 10?</p> <p>16 A Yes, I was.</p> <p>17 Q Do you recognize this audio file?</p> <p>18 A I do not.</p> <p>19 Q Have you ever listened to it before?</p> <p>20 A I have not.</p> <p>21 Q Do you know who the two individuals are</p> <p>22 that are speaking in that audio file?</p> <p>23 A I believe the two individuals are</p> <p>24 Catherine -- well, no, I guess I'm not sure. One of</p> <p>25 them is obviously Aubry, but I'm not clear if the</p>	<p style="text-align: right;">Page 63</p> <p style="text-align: center;">C. Talbot</p> <p>1 other person was Melanie Freiberg or Catherine</p> <p>2 Miolla, but I would believe it was one of those two,</p> <p>3 or both of them, perhaps, were on the call.</p> <p>4</p> <p>5 Q So I can represent to you that pursuant</p> <p>6 to the sworn deposition testimony of both Melanie</p> <p>7 Freiberg and Catherine Miolla, the two speakers on</p> <p>8 the call, which is represented in Plaintiff's</p> <p>9 Exhibit 10, were Melanie Freiberg and Aubry McMahon.</p> <p>10 I'm representing that to you.</p> <p>11 A Okay.</p> <p>12 Q Ms. Talbot, do you know if anybody else</p> <p>13 was a participant on this call?</p> <p>14 A I -- I don't know that. I don't know.</p> <p>15 Q Were you personally on this phone call?</p> <p>16 A I was not on the phone.</p> <p>17 Q Do you know why you were not personally</p> <p>18 on this telephone call?</p> <p>19 A Why would I be on such a call? I --</p> <p>20 Q Well, hypothetically, someone could have</p> <p>21 directed you to be on the call, it could have been</p> <p>22 part of your job functions to be on a call of this</p> <p>23 nature, Melanie may have asked you to be on this call</p> <p>24 as a personal favor; so there could be a -- a</p> <p>25 rationale as to why you would or wouldn't be on a</p>
<p style="text-align: right;">Page 64</p> <p style="text-align: center;">C. Talbot</p> <p>1 particular call.</p> <p>2</p> <p>3 I'm just asking if from your</p> <p>4 recollection, do you know why you were not personally</p> <p>5 on the call?</p> <p>6 MR. WARD: I'm going to object as to</p> <p>7 form.</p> <p>8 But you may answer.</p> <p>9 A Yeah. I don't -- I don't recall being</p> <p>10 requested to be on the call. My job duties as a</p> <p>11 senior vice president would not typically include</p> <p>12 being on a call with a candidate.</p> <p>13 Q If you can remember, did you direct</p> <p>14 anybody to make a telephone call to Aubry McMahon</p> <p>15 rescinding her offer of employment with World Vision?</p> <p>16 A I don't recall directing someone to call</p> <p>17 her with -- with -- with that.</p> <p>18 Q Did you advise somebody to communicate to</p> <p>19 Aubry McMahon, whether it be telephone or otherwise,</p> <p>20 that the offer of employment was going to be</p> <p>21 rescinded?</p> <p>22 A I don't recall the specifics of my</p> <p>23 telling or directing. I can say that having made the</p> <p>24 decision, yes, I would have directed a communication</p> <p>25 to the -- the job offeree to be informed of the</p>	<p style="text-align: right;">Page 65</p> <p style="text-align: center;">C. Talbot</p> <p>1 decision.</p> <p>2</p> <p>3 Q Would you agree that Melanie Freiberg</p> <p>4 states in this audio recording, "Well, it is because,</p> <p>5 um, the standards of conduct, yeah, are to, um, not</p> <p>6 have any sexual conduct outside of marriage, and</p> <p>7 marriage is defined as being between a man and a</p> <p>8 woman, so that's the behavior that all employees have</p> <p>9 to comply with"?</p> <p>10 MR. WARD: I'm going to object as to</p> <p>11 form.</p> <p>12 A Having heard the recording for the first</p> <p>13 time and one time, what you played back sounds like</p> <p>14 what I remembered hearing just now, though I don't</p> <p>15 know if you were reading word for word from a</p> <p>16 transcript of it or not, but it -- it -- it sounds</p> <p>17 like what I heard.</p> <p>18 Q Ms. Talbot, would you agree that</p> <p>19 according to Melanie Freiberg, as stated to Aubry</p> <p>20 McMahon in this audio recording, the reason the offer</p> <p>21 of employment made by World Vision to Aubry McMahon</p> <p>22 was being rescinded was because she was in a same-sex</p> <p>23 marriage?</p> <p>24 MR. WARD: I'm going to object as to form</p> <p>25 and misrepresentation.</p>

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<p style="text-align: right;">Page 66</p> <p>1 C. Talbot</p> <p>2 You may answer.</p> <p>3 A Well, what I heard Melanie say is that</p> <p>4 because she couldn't comply with the standards of</p> <p>5 conduct, a specific standard referenced in -- in that</p> <p>6 being, being in a marriage with a man versus a woman</p> <p>7 or not being in a same sex. That's what I heard.</p> <p>8 The inability to comply with the standards of conduct</p> <p>9 would be the reason that that -- that the offer was</p> <p>10 being rescinded.</p> <p>11 Q Based upon listening to this audio, would</p> <p>12 you agree that Melanie Freiberg's rationale as</p> <p>13 conveyed to Aubry McMahon was in accord with what</p> <p>14 your decision was as it related to rescinding the</p> <p>15 offer of employment?</p> <p>16 MR. WARD: I'm going to object as to</p> <p>17 form.</p> <p>18 You may answer.</p> <p>19 A Could -- could you just repeat that --</p> <p>20 that question for me, Teri?</p> <p>21 (WHEREUPON, the previous question was</p> <p>22 read by the court reporter.)</p> <p>23 MR. WARD: I'm going to object as to</p> <p>24 form.</p> <p>25 A I'm sorry, could I just hear it one more</p>	<p style="text-align: right;">Page 67</p> <p>1 C. Talbot</p> <p>2 time? I'm -- I'm sorry, it -- there's a lot to that.</p> <p>3 Just -- just read it to me one more time, Teri.</p> <p>4 Q Well, let me -- let me rephrase the</p> <p>5 question, maybe it's easier.</p> <p>6 A Okay. Okay. Thanks.</p> <p>7 Q Based upon reviewing this audio, was the</p> <p>8 reason as expressed to Aubry McMahon by Melanie</p> <p>9 Freiberg the same reason that you decided to rescind</p> <p>10 the offer of employment?</p> <p>11 MR. WARD: So I'm going to object as to</p> <p>12 form and to foundation.</p> <p>13 A Mel- -- Melanie conveyed the reason for</p> <p>14 the job offer rescission based upon inability for</p> <p>15 Aubry to comply with our standards of conduct, and</p> <p>16 that was the basis of the decision that I made to</p> <p>17 rescind the offer.</p> <p>18 Q Ms. Talbot, to your knowledge, if Aubry</p> <p>19 McMahon had been a man married to a woman, would she</p> <p>20 have been in violation of World Vision's standards of</p> <p>21 conduct for employees?</p> <p>22 MR. WARD: I'm going to object as to form</p> <p>23 and calling for speculation.</p> <p>24 A You know, what I can tell you is that if</p> <p>25 a job applicant represents that they're in a same-sex</p>
<p style="text-align: right;">Page 68</p> <p>1 C. Talbot</p> <p>2 marriage, be it two women or two men, and they are</p> <p>3 unable to comply with our standards of conduct which</p> <p>4 specifically references the biblical covenant of</p> <p>5 marriage between a man and a woman, that would be the</p> <p>6 basis of whether they would be eligible for</p> <p>7 employment or not.</p> <p>8 Q So I believe that your answer reflects a</p> <p>9 policy of World Vision, and I'm asking specifically</p> <p>10 about Aubry McMahon, an interplay between her and</p> <p>11 that policy. So I'm going to ask again.</p> <p>12 If Aubry McMahon had been a man married</p> <p>13 to a woman, would she have been in violation of World</p> <p>14 Vision's standards of conduct?</p> <p>15 MR. WARD: So I'm going to object as to</p> <p>16 form and in still calling for speculation.</p> <p>17 THE WITNESS: So am I being instructed to</p> <p>18 answer the question?</p> <p>19 MR. WARD: You -- you may answer to the</p> <p>20 extent you understand the question, but I'm --</p> <p>21 I mean, I'm -- I'm registering my objection as</p> <p>22 to the form of the question.</p> <p>23 A If Aubry was a man and was married to a</p> <p>24 woman and was willing and able to affirm, you know,</p> <p>25 living in accord with the standards of conduct, not</p>	<p style="text-align: right;">Page 69</p> <p>1 C. Talbot</p> <p>2 in a same-sex marriage, but married to someone of the</p> <p>3 opposite sex, that would make Aubry eligible for</p> <p>4 employment as it related to that particular</p> <p>5 requirement.</p> <p>6 Q To your knowledge, if Aubry McMahon had</p> <p>7 been a man married to a woman, would the offer of</p> <p>8 employment been rescinded?</p> <p>9 MR. WARD: I'm going to object on the</p> <p>10 same grounds; form, speculation.</p> <p>11 A I'm thinking.</p> <p>12 If Aubry was able to comply with our</p> <p>13 standards of conduct and -- and the other</p> <p>14 requirements for being hired for the role, I think</p> <p>15 she would be eligible for -- for a job offer.</p> <p>16 Q Ms. Talbot, to your knowledge, if Aubry</p> <p>17 McMahon had previously been in a same-sex marriage</p> <p>18 but had been divorced and single at the time of her</p> <p>19 having applied, and confirmed that she was willing</p> <p>20 and able to comply with the standards of conduct if</p> <p>21 employed by World Vision, would the offer of</p> <p>22 employment have been rescinded?</p> <p>23 MR. WARD: I'm going to object as to</p> <p>24 form, foundation, and speculation.</p> <p>25 I don't think that's a fair question,</p>

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<p style="text-align: right;">Page 70</p> <p>1 C. Talbot</p> <p>2 Counsel.</p> <p>3 MR. WOLNOWSKI: If she understands the</p> <p>4 question, she can answer.</p> <p>5 MR. WARD: If she understands it.</p> <p>6 A I would like to say that we don't ask</p> <p>7 about the former marital status or history of a job</p> <p>8 candidate; it would not be a fact that would come</p> <p>9 into play of which we would be aware based upon our</p> <p>10 inquiry.</p> <p>11 Q What if somebody had voluntarily</p> <p>12 disclosed it?</p> <p>13 MR. WARD: Same objections.</p> <p>14 A The hiring process is based upon</p> <p>15 screening or affirming and complying in the present</p> <p>16 with the standards of conduct.</p> <p>17 Q So I'm not sure that answers the</p> <p>18 question.</p> <p>19 If Aubry McMahon had previously been in a</p> <p>20 same-sex marriage but had been divorced and single at</p> <p>21 the time of her having applied and voluntarily</p> <p>22 disclosed that she had previously been in a same-sex</p> <p>23 marriage, but nevertheless stated that she was</p> <p>24 willing and able to comply with the standards of</p> <p>25 conduct if employed by World Vision, would the offer</p>	<p style="text-align: right;">Page 71</p> <p>1 C. Talbot</p> <p>2 of employment have been rescinded?</p> <p>3 MR. WARD: So I'm going to object; form,</p> <p>4 foundation, speculation, compound-complex.</p> <p>5 You're presenting a hypothetical and</p> <p>6 talking about it as though it's Ms. McMahon.</p> <p>7 It's not.</p> <p>8 Can you ask an appropriate question for a</p> <p>9 fact witness, please?</p> <p>10 MR. WOLNOWSKI: No. She can answer if</p> <p>11 she understands it.</p> <p>12 Thank you, Counselor.</p> <p>13 A I'm thinking.</p> <p>14 I understand the question. I understand</p> <p>15 it's hypothetical. I understand it's not relevant,</p> <p>16 to the best of my understanding of the facts that</p> <p>17 we're talking about, that it's applicable to this</p> <p>18 particular job offer rescind. And if you're asking</p> <p>19 me to opine about other scenarios that could be</p> <p>20 applicable to other people, then that feels like a</p> <p>21 different question to me.</p> <p>22 Q If you could, please answer it then.</p> <p>23 MR. WARD: I think she just did.</p> <p>24 MR. WOLNOWSKI: No, she didn't.</p> <p>25 Q Could you please answer the question?</p>
<p style="text-align: right;">Page 72</p> <p>1 C. Talbot</p> <p>2 A So let me clarify, if I could.</p> <p>3 Are you asking me that if another</p> <p>4 candidate voluntarily disclosed in the screening for</p> <p>5 employment eligibility process that they'd been in a</p> <p>6 previous same-sex marriage, and also, in the</p> <p>7 employment screen for eligibility for hire, indicated</p> <p>8 that they were able to currently be in compliance --</p> <p>9 were willing and able to be in compliance with our</p> <p>10 standards of conduct, could they be considered for</p> <p>11 employment; is that what you're asking me?</p> <p>12 Q Yes, that's a -- I think a good</p> <p>13 alternative way of putting it.</p> <p>14 A Okay. They would be eligible for</p> <p>15 consideration for employment, yes.</p> <p>16 Q Understood.</p> <p>17 And is that by virtue of not being in a</p> <p>18 same-sex marriage at the time of application?</p> <p>19 MR. WARD: Objection as to form;</p> <p>20 mischaracterizes testimony.</p> <p>21 A If that -- if that candidate affirmed</p> <p>22 their willingness and ability in the present to</p> <p>23 comply with the standards of conduct as described in</p> <p>24 the interview, they would be eligible for</p> <p>25 consideration for employment.</p>	<p style="text-align: right;">Page 73</p> <p>1 C. Talbot</p> <p>2 Q I'd like to show you what has been</p> <p>3 previously marked Plaintiff's Exhibit Number 12. It</p> <p>4 is a document bearing Bates-stamped Numbers WV 2852</p> <p>5 to 2853. I will represent to you that this document</p> <p>6 was exchanged during the discovery phase of</p> <p>7 litigation.</p> <p>8 Please review this document and let me</p> <p>9 know once you've completed doing so.</p> <p>10 MR. WOLNOWSKI: Off the record.</p> <p>11 (Discussion held off the record)</p> <p>12 Q Do you recognize this document?</p> <p>13 A I do not.</p> <p>14 Q Have you ever seen it before?</p> <p>15 A No. It appears to be a document</p> <p>16 published by a person I don't know, and published on</p> <p>17 the Web site with which I'm unfamiliar.</p> <p>18 Q I'd like to direct your attention to the</p> <p>19 second page of the document, the one marked WV 2853,</p> <p>20 and the text under the heading which reads</p> <p>21 "Employment and Sexual Orientation"; do you see that?</p> <p>22 A I do.</p> <p>23 Q Have you had a chance to review those two</p> <p>24 paragraphs under that heading?</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 74</p> <p>1 C. Talbot</p> <p>2 Q So if I'm understanding this correctly,</p> <p>3 and to the extent you know, the policy of World</p> <p>4 Vision Incorporated, at least as of March 11th, 2022,</p> <p>5 is that being gay is not a disqualifier for being</p> <p>6 employed by World Vision, but being in a same-sex</p> <p>7 marriage is.</p> <p>8 MR. WARD: Objection as to form.</p> <p>9 Q Would you agree with that understanding?</p> <p>10 MR. WARD: Objection as to form.</p> <p>11 A Please repeat -- please read it back,</p> <p>12 Teri; would you?</p> <p>13 (WHEREUPON, the previous question was</p> <p>14 read by the court reporter.)</p> <p>15 MR. WARD: So same objection as to form.</p> <p>16 A So being in a same-sex marriage would</p> <p>17 prohibit an applicant from being in a marriage</p> <p>18 between a man and a woman, which is a requirement to</p> <p>19 be compliant with the standards of conduct.</p> <p>20 Q Do you know if this was the policy of</p> <p>21 World Vision Incorporated as of January of 2021?</p> <p>22 A Yes.</p> <p>23 MR. WARD: Objection to form.</p> <p>24 Q Ms. Talbot, to the extent you know or to</p> <p>25 the extent you were told by anybody at World Vision,</p>	<p style="text-align: right;">Page 75</p> <p>1 C. Talbot</p> <p>2 what is the basis for one being in a same-sex</p> <p>3 marriage serving as a disqualifier for employment</p> <p>4 with World Vision?</p> <p>5 A Well, this is spelled out really well in</p> <p>6 the document I would believe that you have, which is</p> <p>7 the -- the policy -- the ethics -- business and</p> <p>8 ethics policy and the supporting explanation of the</p> <p>9 standards of conduct and expectations of behavior.</p> <p>10 And throughout that document, it reflects the basis</p> <p>11 for the sincerely held beliefs of the organization,</p> <p>12 and it is filled with biblical references, of course</p> <p>13 that being the source for -- for the Christian faith.</p> <p>14 So I think it's -- it's very well articulated in --</p> <p>15 in that policy and in that supporting document.</p> <p>16 Q I don't want to mischaracterize your</p> <p>17 testimony, but is the short answer, in essence, the</p> <p>18 Bible, that's the basis -- that's from where the</p> <p>19 policy derives?</p> <p>20 MR. WARD: I'll object as to form.</p> <p>21 You may answer.</p> <p>22 A Well, the sincerely held religious</p> <p>23 beliefs of the Christian organization World Vision</p> <p>24 U.S. is drawn from the Bible, yes.</p> <p>25 Q To your knowledge and to the extent you</p>
<p style="text-align: right;">Page 76</p> <p>1 C. Talbot</p> <p>2 know, isn't being gay also prohibited in the Bible?</p> <p>3 MR. WARD: Objection as to form and</p> <p>4 foundation.</p> <p>5 A I'm not a theologian. I know what the</p> <p>6 organization's sincerely held beliefs are, and I just</p> <p>7 don't recall documents of World Vision really talking</p> <p>8 about being gay, but what they talk about is the</p> <p>9 biblical covenant of marriage.</p> <p>10 Maybe -- maybe I -- I need a different</p> <p>11 question.</p> <p>12 Q Well, you had said that there are the</p> <p>13 organa- -- organization's sincerely held beliefs as</p> <p>14 to this, if I understand your response, regarding</p> <p>15 whether or not being gay is prohibited by the Bible.</p> <p>16 Did you -- did you state that in your</p> <p>17 answer?</p> <p>18 MR. WARD: I'm going to --</p> <p>19 A Yes.</p> <p>20 MR. WARD: I'm going to object to form</p> <p>21 and to mischaracterization.</p> <p>22 MR. WOLNOWSKI: Okay.</p> <p>23 Q You can answer the question.</p> <p>24 Is -- is that -- if I'm -- am I</p> <p>25 understanding your explanation correctly?</p>	<p style="text-align: right;">Page 77</p> <p>1 C. Talbot</p> <p>2 MR. WOLNOWSKI: That's really the</p> <p>3 question, is -- is that -- that something she</p> <p>4 said in response.</p> <p>5 MR. WARD: But, Counselor, you just</p> <p>6 mischaracterized her prior testimony.</p> <p>7 Please give her an accurate question.</p> <p>8 Q If you understand the question, you can</p> <p>9 answer.</p> <p>10 A I -- I --</p> <p>11 MR. WOLNOWSKI: Look, Mr. -- Counselor,</p> <p>12 if you want to give follow-up questions, you</p> <p>13 can do so after I've concluded my deposition.</p> <p>14 You have that right. But you do not have the</p> <p>15 right to direct me what I can and cannot ask</p> <p>16 the deponent. If you want to have an</p> <p>17 objection, direct her not to answer, you have</p> <p>18 that right. But to ask me to, you know, ask</p> <p>19 her different questions, I'm just simply not</p> <p>20 going to do that. You don't have that right.</p> <p>21 Thank you, Counselor.</p> <p>22 MR. WARD: I have the right to object. I</p> <p>23 will continue to exercise that right as the</p> <p>24 rules permit.</p> <p>25 A Could I have the question repeated to me,</p>

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<p style="text-align: right;">Page 78</p> <p>1 C. Talbot</p> <p>2 please, at this point?</p> <p>3 Q Well, let me ask you -- I'll ask you a</p> <p>4 different question.</p> <p>5 A Thank you.</p> <p>6 Q Are you aware of World Vision's sincerely</p> <p>7 held beliefs regarding whether or not gay -- being</p> <p>8 gay is prohibited by the Bible?</p> <p>9 MR. WARD: Objection as to form.</p> <p>10 You may answer.</p> <p>11 A I would honestly want to go back to</p> <p>12 the -- the standards of con- -- conduct document and</p> <p>13 the -- the foundations of the organization's</p> <p>14 sincerely held beliefs and go back through that.</p> <p>15 It's not something I have memorized, but I would -- I</p> <p>16 would look to that document to be refreshed about the</p> <p>17 organization's belief about being gay.</p> <p>18 Q Are you personally familiar with the Book</p> <p>19 of Leviticus?</p> <p>20 A I know it's in the Bible, and at some</p> <p>21 point in my life, I've read it.</p> <p>22 Q Are you familiar with the following</p> <p>23 passage found at Chapter 20, verse 13, in the Book of</p> <p>24 Leviticus: "If a man lies with a man, as one does</p> <p>25 with a woman, both of them have done what is</p>	<p style="text-align: right;">Page 79</p> <p>1 C. Talbot</p> <p>2 detestable; they are to be put to death; their blood</p> <p>3 will be on their own heads"?</p> <p>4 Are you familiar with that verse?</p> <p>5 A I'm not.</p> <p>6 Q Well, I can represent that that came from</p> <p>7 the Bible which was provided to me in discovery by</p> <p>8 your -- by World Vision's legal counsel.</p> <p>9 Now, according to that Faith and Action</p> <p>10 Study Bible produced in discovery, Leviticus states</p> <p>11 that its contents were given to Moses by God at</p> <p>12 Mount Sinai. And when I say "Mount Sinai," I'm</p> <p>13 speaking of the mountain on the Sinai Peninsula of</p> <p>14 Egypt, not the hospital network in New York. Just</p> <p>15 want to attribute it to the appropriate speaker for</p> <p>16 the sake of the record.</p> <p>17 The passage and the verse that I read to</p> <p>18 you, would you personally agree that it condemns</p> <p>19 homosexuality?</p> <p>20 MR. WARD: Objection as to form.</p> <p>21 A I'm struggling, honestly, with the</p> <p>22 relevance of my personal interpretation and</p> <p>23 understanding of that Bible verse as it relates to</p> <p>24 the cares and claims of this case.</p> <p>25 Q Are you declining to answer on that</p>
<p style="text-align: right;">Page 80</p> <p>1 C. Talbot</p> <p>2 basis?</p> <p>3 A If I can legitimately, I -- I would. I</p> <p>4 am uncomfortable acting as a theological interpreter</p> <p>5 of the Bible in this deposition. I -- yeah.</p> <p>6 Q So my understanding is you're refusing to</p> <p>7 answer the question.</p> <p>8 A Is -- is your question to ask me to be a</p> <p>9 theological interpreter of the Bible in this</p> <p>10 deposition?</p> <p>11 Q The way this works is I ask questions,</p> <p>12 you answer them. It's not the other way around.</p> <p>13 MR. WARD: But Mr. -- Mr. --</p> <p>14 MR. WOLNOWSKI: Counselor, if you'd like</p> <p>15 to put an objection on the record, you may.</p> <p>16 MR. WARD: Counsel, I am objecting on the</p> <p>17 record. Let me be very clear, you're allowed</p> <p>18 to seek either admissible evidence or evidence</p> <p>19 that's likely to lead to admissible evidence.</p> <p>20 You've laid zero foundation for how the</p> <p>21 witness' personal opinion about the meaning of</p> <p>22 one verse that you have selected out the</p> <p>23 Bible, in exclusion of the entire rest of the</p> <p>24 Bible, is relevant to her position, let alone</p> <p>25 to World Vision's position. So I -- I am</p>	<p style="text-align: right;">Page 81</p> <p>1 C. Talbot</p> <p>2 objecting pretty strenuously based on</p> <p>3 foundation and relevance.</p> <p>4 If you want to try and lay one, that's</p> <p>5 fine; but I just want to have a very clear</p> <p>6 record that you're kind of taking us out in</p> <p>7 the hinterlands here, and I -- I don't think</p> <p>8 this is admissible and I don't think it's</p> <p>9 likely to lead to admissible evidence. I</p> <p>10 think it's a frolic and a detour, to be quite</p> <p>11 honest.</p> <p>12 MR. WOLNOWSKI: So are you directing</p> <p>13 the -- your client not to answer?</p> <p>14 MR. WARD: I am registering my objection</p> <p>15 on the record.</p> <p>16 To the extent that the client understands</p> <p>17 the question and has an opinion, she is free</p> <p>18 to express her personal opinion.</p> <p>19 A I'd like to say that I don't have a</p> <p>20 personal opinion of how that Bible verse --</p> <p>21 Q To the extent you know, in January of</p> <p>22 2021, was it the policy of World Vision that</p> <p>23 homosexuality violated the covenants of the Bible?</p> <p>24 MR. WARD: Objection as to form.</p> <p>25 MR. WOLNOWSKI: Are you directing the</p>

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<p style="text-align: right;">Page 82</p> <p>1 C. Talbot</p> <p>2 witness not to answer?</p> <p>3 MR. WARD: I simply objected as to form,</p> <p>4 Counsel.</p> <p>5 A I would defer to the scriptural</p> <p>6 references and content of World Vision's standard of</p> <p>7 conduct document, that I don't have memorized but is</p> <p>8 available, in order to accurately reflect the</p> <p>9 sincerely held beliefs of the organization.</p> <p>10 Q Okay. So I think we should take a moment</p> <p>11 for you to review that.</p> <p>12 A Okay.</p> <p>13 Q Is that okay with you?</p> <p>14 A Yes.</p> <p>15 MR. WARD: I'm sorry, what's the "that";</p> <p>16 the standards of conduct?</p> <p>17 MR. WOLNOWSKI: Yes.</p> <p>18 MR. WARD: Thank you.</p> <p>19 Q Do you have that document in front of</p> <p>20 you, Ms. Talbot?</p> <p>21 A No, I -- okay. I -- I will have to go</p> <p>22 get it. It was sent to me, so --</p> <p>23 MR. WARD: I believe that's an exhibit</p> <p>24 you may have provided, Mr. Wolnowski. I can</p> <p>25 try and pull up the version that you provided,</p>	<p style="text-align: right;">Page 83</p> <p>1 C. Talbot</p> <p>2 if that's helpful, or if you've got it at</p> <p>3 hand, that would be great.</p> <p>4 MR. WOLNOWSKI: Well, let's go off the</p> <p>5 record.</p> <p>6 (Discussion held off the record)</p> <p>7 (WHEREUPON, a brief recess was taken,</p> <p>8 after which the following transpired:)</p> <p>9 (Time noted: 3:31 p.m.)</p> <p>10 MR. WOLNOWSKI: Let's go back on the</p> <p>11 record.</p> <p>12 CONTINUED EXAMINATION BY MR. WOLNOWSKI</p> <p>13 Q Ms. Talbot, when we went off, you had</p> <p>14 mentioned that you wanted to review a document as it</p> <p>15 related to your ability to answer the question that I</p> <p>16 had posed.</p> <p>17 MR. WOLNOWSKI: And if you could,</p> <p>18 Ms. Ratigan, could you read back the question</p> <p>19 that was interposed prior to Ms. Talbot</p> <p>20 needing to review that document?</p> <p>21 (WHEREUPON, the previous question was</p> <p>22 read by the court reporter.)</p> <p>23 MR. WARD: Objection as to form.</p> <p>24 You may answer.</p> <p>25 A So now it's -- that question is directed</p>
<p style="text-align: right;">Page 84</p> <p>1 C. Talbot</p> <p>2 back to me; am I correct?</p> <p>3 Q Yes.</p> <p>4 A Okay.</p> <p>5 Q And if you could, now that you've had a</p> <p>6 chance to review the document that you had mentioned,</p> <p>7 are you able to answer that question?</p> <p>8 A Yes, I believe so. I am looking at the</p> <p>9 document and I had a chance to review it, and in that</p> <p>10 document, it -- it represents Christian behaviors</p> <p>11 that the organization deems as being nonacceptable</p> <p>12 sexual conduct outside the biblical covenant of</p> <p>13 marriage between a man and a woman. And my</p> <p>14 understanding of a homosexual relationship is that it</p> <p>15 would be between same-sex partners in contrast to the</p> <p>16 definition presented by World Vision's policy being</p> <p>17 between specifically opposite sex; man and a woman.</p> <p>18 Q In January of 2021, did being homosexual</p> <p>19 offend the standards of conduct of employees for</p> <p>20 World Vision?</p> <p>21 MR. WARD: Objection as to form.</p> <p>22 A I need clarity on the reference to</p> <p>23 "offend." If I -- if I heard you correctly, you used</p> <p>24 the word "offend."</p> <p>25 What do you mean by that?</p>	<p style="text-align: right;">Page 85</p> <p>1 C. Talbot</p> <p>2 Q Does it not comport?</p> <p>3 A Oh. So this policy wasn't in fact -- was</p> <p>4 in -- was in effect in January of 2021, and it would</p> <p>5 have applied at that time, this sincerely held</p> <p>6 religious belief that sexual conduct outside the</p> <p>7 biblical covenant of marriage is to be between a man</p> <p>8 and a woman.</p> <p>9 Q So homosexuality would not comport with</p> <p>10 World Vision's standards of conduct; is that correct?</p> <p>11 MR. WARD: Objection as to form and asked</p> <p>12 and answered.</p> <p>13 A I -- I -- I -- I would say what the</p> <p>14 beliefs reflected here are talking about is sexual</p> <p>15 conduct in a biblical covenant of marriage. It's not</p> <p>16 saying anything specifically about homosexuality.</p> <p>17 It's talking about marriage and sexual conduct.</p> <p>18 Those are the two things referenced here.</p> <p>19 Q I'd like to show you what will be marked</p> <p>20 Plaintiff's Exhibit Number 17. It is a document</p> <p>21 which is Bates-stamped WV 1818. I can represent that</p> <p>22 this document was exchanged during the discovery</p> <p>23 phase of litigation in this matter.</p> <p>24 If you could, please review this document</p> <p>25 and let me know once you've completed doing so.</p>

Christine Talbot

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<p style="text-align: right;">Page 86</p> <p>1 C. Talbot</p> <p>2 A I'm still pulling it up. Give me a</p> <p>3 moment, please.</p> <p>4 MR. WOLNOWSKI: Okay. We can go off.</p> <p>5 (Discussion held off the record)</p> <p>6 (WHEREUPON, the above-referred-to</p> <p>7 document, Bates-stamped WV-001818, was marked</p> <p>8 as Plaintiff's Exhibit 17, for identification,</p> <p>9 as of this date.)</p> <p>10 Q Do you recognize this document?</p> <p>11 A You know, I -- I -- it -- it's not -- I</p> <p>12 don't have recollection of this.</p> <p>13 Q Have you ever seen it before?</p> <p>14 A I -- I don't recall this document.</p> <p>15 Q I can represent to you that this document</p> <p>16 appears to an e-mail sent from a person named Andrea</p> <p>17 McDaniel Smith on January 10th, 2020.</p> <p>18 Do you dispute that this e-mail was</p> <p>19 indeed sent to you on January 10th, 2020?</p> <p>20 A No, I don't dispute that, I just don't</p> <p>21 have recollection of it.</p> <p>22 Q If you can recall, who is Andrea McDaniel</p> <p>23 Smith?</p> <p>24 A Andrea McDaniel Smith is an external</p> <p>25 recruiter at a search firm.</p>	<p style="text-align: right;">Page 87</p> <p>1 C. Talbot</p> <p>2 Q According to this e-mail, it appears she</p> <p>3 works for a company called CarterBaldwin Executive</p> <p>4 Search; would you agree?</p> <p>5 A Yeah, I -- I -- I -- I have known Andrea</p> <p>6 to work for that firm, yes.</p> <p>7 Q Isn't it true, generally speaking,</p> <p>8 CarterBaldwin provides executive search services for</p> <p>9 a variety of industries including higher education</p> <p>10 and nonprofit organizations?</p> <p>11 A Yes, that's my understanding of what they</p> <p>12 do.</p> <p>13 Q If you can recall, who is the person</p> <p>14 named Lily that is referenced in this e-mail?</p> <p>15 A I don't recall. I don't recall.</p> <p>16 Q From your recollection, was a person</p> <p>17 named Lily being considered for a position with World</p> <p>18 Vision in or around January of 2020?</p> <p>19 A I -- I don't recall this name, Lily.</p> <p>20 Q I'd like to direct your attention to the</p> <p>21 final sentence of this e-mail which reads, "Supports</p> <p>22 World Vision's standards of conduct belief in</p> <p>23 traditional marriage."</p> <p>24 Do you see that?</p> <p>25 A I did see that.</p>
<p style="text-align: right;">Page 88</p> <p>1 C. Talbot</p> <p>2 Q Did she include that in an e-mail that</p> <p>3 she sent to you on January 10th?</p> <p>4 A Well, I could only say I didn't recall</p> <p>5 this e-mail, but I see this in the e-mail that I have</p> <p>6 said -- you know, I'm not disputing that it was sent</p> <p>7 to me or that this exchange happened, I just don't</p> <p>8 have recollection of this e-mail or the -- the</p> <p>9 concepts of this e-mail.</p> <p>10 Q Do you know why she wrote that in this</p> <p>11 e-mail?</p> <p>12 MR. WARD: Objection as to form.</p> <p>13 A Can I ask you, what do you mean what --</p> <p>14 what do you mean she wrote "this"; could you clarify</p> <p>15 "this"?</p> <p>16 Q Sure. This last sentence which starts</p> <p>17 with the word "Supports."</p> <p>18 A Well, if I recall about this time -- and</p> <p>19 I don't recall specifically -- we did have -- during</p> <p>20 my tenure, we did have an engagement with Carter- --</p> <p>21 CarterBaldwin to search for a role and -- and made</p> <p>22 known to CarterBaldwin the requirements of World</p> <p>23 Vision to be considered for employment being both the</p> <p>24 ability to affirm either the Apostles' Creed or our</p> <p>25 statement of faith and to affirm and being willing to</p>	<p style="text-align: right;">Page 89</p> <p>1 C. Talbot</p> <p>2 comply with our standards of conduct. That's</p> <p>3 something that a recruiter outside of the</p> <p>4 organization would -- would need to understand in</p> <p>5 order to effectively help us find qualified and</p> <p>6 employment-eligible prospects.</p> <p>7 Q But it appears as though Lily was in a</p> <p>8 traditional marriage, based upon the content of this</p> <p>9 e-mail; wouldn't you agree?</p> <p>10 A I -- I -- I see man and woman</p> <p>11 references -- husband and wife in here. That's what</p> <p>12 I would take away from this, yes.</p> <p>13 Q In January of 2020, to the extent you</p> <p>14 know, Ms. Talbot, was it a disqualifier for</p> <p>15 employment with World Vision for a person to so much</p> <p>16 as support the idea of people being in a same-sex</p> <p>17 marriage even if he or she isn't actually in one</p> <p>18 himself or herself?</p> <p>19 MR. WARD: Objection as to form.</p> <p>20 A I would -- I would ask you to repeat --</p> <p>21 repeat that question.</p> <p>22 Q Ms. Talbot, to the extent you know, in</p> <p>23 January of 2020, was it a disqualifier for employment</p> <p>24 with World Vision for a person to so much as support</p> <p>25 the idea of people being in a same-sex marriage even</p>

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<p style="text-align: right;">Page 90</p> <p>1 C. Talbot</p> <p>2 if he or she wasn't actually in one himself or</p> <p>3 herself?</p> <p>4 MR. WARD: Same objection as to form.</p> <p>5 You may answer.</p> <p>6 A An applicant's personal beliefs about</p> <p>7 same-sex marriage were not a part of the interview or</p> <p>8 screening process.</p> <p>9 Q What if somebody voluntarily disclosed</p> <p>10 that information during the interview process; in</p> <p>11 other words, what if somebody disclosed, "I'm in a</p> <p>12 traditional marriage; however, I support people</p> <p>13 having the ability to be in a same-sex marriage if</p> <p>14 they wish" --</p> <p>15 MR. WARD: Objection --</p> <p>16 Q -- from your knowledge and your</p> <p>17 experience, would that have served as a disqualifier?</p> <p>18 MR. WARD: Objection as to form.</p> <p>19 A It wouldn't have disqualified somebody</p> <p>20 from being considered. But to be considered, they</p> <p>21 would need to be able to affirm the Christian faith</p> <p>22 and affirm or comply -- be willing and -- and able to</p> <p>23 comply with the standards of conduct.</p> <p>24 Q Ms. Talbot, to the extent you know, why</p> <p>25 is the belief in traditional marriage so important to</p>	<p style="text-align: right;">Page 91</p> <p>1 C. Talbot</p> <p>2 World Vision at least with respect to eligibility for</p> <p>3 employment?</p> <p>4 MR. WARD: Objection as to form.</p> <p>5 You may answer.</p> <p>6 A One thing that's important to know is</p> <p>7 I -- the -- the standards of conduct and the core</p> <p>8 documents of the organization were written and</p> <p>9 established prior to my employment. I can't say that</p> <p>10 I can be, you know, the best or, in fact, a</p> <p>11 spokesperson as to the motivations or the importance</p> <p>12 of all aspects of all that's included in the</p> <p>13 standards of conduct or other -- the organization's</p> <p>14 other documents. I would say that everything that is</p> <p>15 included in that policy and those standards of</p> <p>16 conduct is important and was important enough to --</p> <p>17 to codify in that document.</p> <p>18 Q To your knowledge, why weren't other</p> <p>19 things codified in that document; for example, why</p> <p>20 wasn't the affirmation that one will not engage in</p> <p>21 gambling made part of the standards of conduct?</p> <p>22 Again, this is to the extent you know. I'm not</p> <p>23 asking to speculate. I'm just asking if you know.</p> <p>24 A Well, I never was in any conversation</p> <p>25 that specifically addressed that question, Do we put</p>
<p style="text-align: right;">Page 92</p> <p>1 C. Talbot</p> <p>2 gambling in or do we not put gambling in, because I</p> <p>3 wasn't a part of any of the creation of the document.</p> <p>4 I -- I would say, however, having, you</p> <p>5 know, looked at the document again here afresh a few</p> <p>6 minutes ago -- and I -- I shut it down, I can pull it</p> <p>7 back up -- I think that question is really addressed</p> <p>8 in there because it addressed the fact that the list</p> <p>9 of things isn't exhaustive, but, in fact, the</p> <p>10 document, as I understand it, seeks to provide a set</p> <p>11 of biblical precepts supported by scripture that</p> <p>12 would characterize Christian behavior, and one can</p> <p>13 use those precepts in that document and answer</p> <p>14 questions that's needed not contained in the</p> <p>15 document. One of them, for example, is, Does it</p> <p>16 glorify God? There's some other content in there</p> <p>17 about stewardship.</p> <p>18 So the fact that everything isn't</p> <p>19 addressed in the rationale why this is in or that's</p> <p>20 in, I wasn't a part of creating those documents, and</p> <p>21 I can't answer something like that specifically, but</p> <p>22 I always would go back to that document; what -- how</p> <p>23 is Christian conduct being described, what are the</p> <p>24 precepts, what are the scriptures, and what are the</p> <p>25 questions to ask about whatever those specific things</p>	<p style="text-align: right;">Page 93</p> <p>1 C. Talbot</p> <p>2 might be, but --</p> <p>3 Q It wasn't always the policy that being in</p> <p>4 a same-sex marriage acted as a disqualifier for</p> <p>5 employment with World Vision; correct?</p> <p>6 MR. WARD: Objection as to form.</p> <p>7 You may answer.</p> <p>8 A Well, there was a time that predates me</p> <p>9 that I understand, in the history of the</p> <p>10 organization, there were a couple of dates when there</p> <p>11 was a -- there was a policy change.</p> <p>12 Q Ms. Talbot, I'd like to show you what</p> <p>13 will be marked Plaintiff's Exhibit 18. It's a</p> <p>14 document bearing Bates-stamped Numbers 1152 to 1153.</p> <p>15 If you could, please review this document</p> <p>16 and let me know once you've had the chance to</p> <p>17 conclude doing so.</p> <p>18 A Okay.</p> <p>19 (WHEREUPON, the above-referred-to</p> <p>20 document, Bates-stamped WV-001152 through</p> <p>21 WV-001153, was marked as Plaintiff's</p> <p>22 Exhibit 18, for identification, as of this</p> <p>23 date.)</p> <p>24 A Okay. I have the document open. I'm</p> <p>25 just going to begin to look it over.</p>

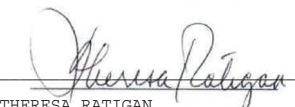
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<p style="text-align: right;">Page 94</p> <p>1 C. Talbot</p> <p>2 (Perusing a document)</p> <p>3 Okay. I've had a chance to look at that.</p> <p>4 Q Do you recognize this document?</p> <p>5 A I saw the name of the document and I know</p> <p>6 the existence of this document.</p> <p>7 Q I'm sorry, could you repeat that?</p> <p>8 A I saw the name of the document at the</p> <p>9 bottom of the page, and I know of the existence of</p> <p>10 this document.</p> <p>11 Q Have you ever seen it before?</p> <p>12 A I don't specifically recall seeing this.</p> <p>13 Q I'd like to direct your attention to</p> <p>14 the first page, it's under a section entitled</p> <p>15 "Question 2," and then under a subsection entitled</p> <p>16 "Supporting Points."</p> <p>17 It reads, "In 2014, in deference to the</p> <p>18 authority of local churches, World Vision removed the</p> <p>19 phrase 'between a man and a woman' in our policy on</p> <p>20 marriage. But our board quickly reinstated it when</p> <p>21 we realized our partners and the public understood</p> <p>22 our decision to mean that we had redefined what it</p> <p>23 meant to be a Christian organization."</p> <p>24 Continuing onto the next page, in the</p> <p>25 last paragraph of that subsection, it reads, and I</p>	<p style="text-align: right;">Page 95</p> <p>1 C. Talbot</p> <p>2 quote, "As the culture tide was changing, the board</p> <p>3 was attempting to take what they thought was a</p> <p>4 measured approach. The decision endorsed the idea of</p> <p>5 allowing avowed Christians in same-sex marriages to</p> <p>6 work at World Vision based on the pastoral guidance</p> <p>7 of their church/denomination. A few days after the</p> <p>8 policy change was announced, the board reversed it</p> <p>9 per management's recommendation."</p> <p>10 Now, Ms. Talbot, I know that this change</p> <p>11 predates your date of commencement; correct?</p> <p>12 A Yes, that's correct.</p> <p>13 Q Did you ever learn with any kind of</p> <p>14 specificity why the policy was changed back by the</p> <p>15 board so quickly in 2014?</p> <p>16 A Well, what -- what I knew is actually --</p> <p>17 or heard is actually what is reflected in -- in this</p> <p>18 document. There was something here that I read that</p> <p>19 I had also heard, and it was this part about -- about</p> <p>20 where -- where it says, "but our board quickly</p> <p>21 reinstated it when" -- meaning the policy of marriage</p> <p>22 between a man and a woman -- "when we realized our</p> <p>23 partners and the public understood our decision to</p> <p>24 mean that we had redefined what it meant to be a</p> <p>25 Christian organization."</p>
<p style="text-align: right;">Page 96</p> <p>1 C. Talbot</p> <p>2 And that was -- what's printed here is</p> <p>3 what, you know, my understanding was once I joined</p> <p>4 the organization and learned more about this.</p> <p>5 MR. WOLNOWSKI: All right. Let's take a</p> <p>6 five-minute break, and I'll be back in --</p> <p>7 4 o'clock.</p> <p>8 THE WITNESS: Okay.</p> <p>9 MR. WARD: Very good. Thank you.</p> <p>10 (WHEREUPON, a brief recess was taken,</p> <p>11 after which the following transpired:)</p> <p>12 (Time noted: 4:00 p.m.)</p> <p>13 MR. WOLNOWSKI: Ms. Talbot, I have no</p> <p>14 further questions.</p> <p>15 Thank you.</p> <p>16 (Continued on page 97 so that the</p> <p>17 conclusion of the testimony may be accompanied</p> <p>18 by the jurat.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 97</p> <p>1 C. Talbot</p> <p>2 MR. WARD: Very good. Thank you.</p> <p>3 I have no questions.</p> <p>4 MR. WOLNOWSKI: Okay.</p> <p>5 (WHEREUPON, the examination of this</p> <p>6 witness was concluded at 4:01 p.m.)</p> <p>7</p> <p>8 _____</p> <p>9 CHRISTINE TALBOT</p> <p>10</p> <p>11 Subscribed and sworn to before me</p> <p>12 this ____ day of _____ 2023.</p> <p>13</p> <p>14 _____</p> <p>15 NOTARY PUBLIC</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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2				2	ERRATA SHEET FOR THE TRANSCRIPT OF:		
3	I N D E X			3	Case Name: AUBRY MCMAHON v WORLD VISION, INC.		
4				4	Proceeding Date: March 8, 2023		
5	WITNESS	EXAMINATION BY	PAGE	5	Deponent: CHRISTINE TALBOT		
6	Christine Talbot	Mr. Wolnowski	5	6	Place: Remote Video Conference		
7				7	* PLEASE MAKE ANY CORRECTIONS/CHANGES BELOW AND		
8				8	NOTE THE REASON FOR SAME *		
9	EXHIBITS			9	PG / LN	/	NOW READS
10				10	/	/	SHOULD READ
11	PLAINTIFF'S			11	/	/	/
12	EXHIBITS	DESCRIPTION	PAGE	12	/	/	/
13	14	World Vision's Privilege Log,		13	/	/	/
14	15	Updated August 5, 2022	30	14	/	/	/
15		Bates-stamped WV-00695 through		15	/	/	/
16		WV-006096	35	16	/	/	/
17	16	Bates-stamped WV-006097 through		17	/	/	/
18	17	WV-006098	41	18	/	/	/
19	18	Bates-stamped WV-001818	86	19	/	/	/
20		Bates-stamped WV-001152 through		20	/	/	/
21		WV-001153	93	21	Under penalties of perjury, I declare that I have		
22	(WHEREUPON, original exhibits marked			22	read the foregoing transcript and that the facts		
23	during today's deposition were retained by			23	stated in it are true.		
24	U.S. Legal Support.)			24	CHRISTINE TALBOT		
25				25	DATE		
				Subscribed and sworn to before me			
				this ___ day of _____ 2023.			
				NOTARY PUBLIC			
Page 100							
1	C. Talbot						
2							
3	C E R T I F I C A T E						
4							
5	I, THERESA RATIGAN, a Shorthand Reporter and						
6	Notary Public of the State of New York, do hereby						
7	certify:						
8	That the witness whose examination is						
9	hereinbefore set forth, was duly sworn, and that such						
10	examination is a true record of the testimony given						
11	by such witness.						
12	I further certify that I am not related to any						
13	of the parties to this action by blood or marriage;						
14	and that I am in no way interested in the outcome of						
15	this matter.						
16	IN WITNESS WHEREOF, I have hereunto set my						
17	hand this 14th day of March 2023.						
18							
19							
20	THERESA RATIGAN						
21							
22							
23							
24							
25							

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